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1 some degree, succeeded in creating the impression in various
2 courts throughout the United States that Scientology litigation
3 in general is the product of a personal campaign between the
4 lawyers on both sides to use the judicial system to vindicate
5 personal animosities, it has always been our intention to obtain
6 legal redress for our clients. We submit that the Church of
7 Scientology is engaged in an elaborate and concerted plan to
8 create that impression by besieging each of the courts with such
9 a massive amount of paperwork together with incessant charges
10 against me that a true and just adjudication of the rights of
11 the victims have become secondary. An examination of the
12 dockets in virtually every case will reveal that we have been
13 required to continually respond to personal attacks which have
14 cluttered the docket entries. These continued personal attacks,
15 such as motions for disqualification, depositions of counsel,
16 lawsuits against counsel, contempt proceedings against counsel,
17 bar complaints against counsel, and personal harassment of
18 counsel, have resulted in a cluttering of the court dockets and
19 the misdirection of the subject cases. The foregoing approach
20 adopted by the Church pursuant to its written policies has been
21 designed to confuse and obfuscate the legitimate factual and
22 legal issues in the subject litigation. The attack by the
23 Church of Scientology has been uncalled for, distorted, and
24 unlawful.

25 2. In late June or early July, 1979, La Venda Van
26 Schaick engaged me to obtain a refund of funds paid by her to
27 the Church of Scientology in the amount of approximately
28 \$12,800.00. At that time, I knew nothing about the Church of

1 Scientology, and was reluctant to undertake Van Schaick's
2 request because she informed me about the operating practices of
3 the Church towards its so called "enemies". However, at the
4 request of several individuals and after preliminary investi-
5 gation, I sent a letter to the Church dated July 17, 1979
6 requesting a refund of all funds paid by Van Schaick. (Exhibit
7 1 attached.) After sending Exhibit 1, I received a letter from
8 the Church stating that no refund would be paid. (Exhibit 2
9 attached.) During the pendency of the aforestated correspon-
10 dence, an individual holding himself out to be one "Chuck North"
11 contacted me and asked to be engaged as a private investigator/
12 consultant in connection with "researching and investigating
13 cults." North specifically asked and requested to have access
14 to any "cult files" in my office for the purpose of assisting
15 his research and investigation. I became suspicious about the
16 coincidental mailing of the Van Schaick correspondence and the
17 solicitations of North. As it later turned out, North was in
18 fact an agent of the Church seeking to infiltrate our offices.
19 (Exhibit 3, Affidavit of Warren Friske, attached.)

20 3. During the period between July to September, 1979
21 when the correspondence concerning Van Schaick refund was being
22 exchanged, I began to receive telephone calls from clients,
23 relatives, and friends stating that they had received strange
24 telephone calls from various individuals requesting information
25 about me. During the same period of time, in connection with
26 numerous telephone calls and correspondence involving non-
27 Scientology related clients and cases, many strange and suspi-
28 cious incidents occurred which suggested that my telephone calls

1 and office affairs were either being monitored, intercepted, or
2 knowledge about them otherwise obtained. For example, an indi-
3 vidual called one of my clients and told her that I should be
4 reported to the bar because I had not turned over all of the
5 funds I had received in the trial of a case. In fact, the
6 client was present at the trial, received a trial judgment upon
7 a jury verdict, and was paid in full. During the same period of
8 time, namely between July and September, 1979, Van Schaick
9 alleges that she began to be followed, her apartment kept under
10 surveillance, her employment activities monitored, and numerous
11 strange and suspicious circumstances occurred in connection with
12 her daily life, too numerous for purposes of this affidavit.
13 The only activity of mine involving the Church at that point in
14 time had been to send one letter requesting a refund!

15 4. After receiving the letter denying the request
16 for a refund, I received a letter dated September 11, 1979 from
17 the "Church of Scientology of Boston". (Exhibit 4 attached)
18 This letter, together with the other prior strange occurrences,
19 together with the allegations made to me by Van Schaick as to
20 the nature and operating practices of the Church, resulted in
21 the decision by me to initiate an investigation into the entire
22 matter. The September 11 letter stated that the Church would be
23 willing to pay approximately 50% of the funds paid to the Church
24 by Van Schaick and at the same time suggested that Van Schaick
25 should not sue the Church for the balance of the funds because
26 she had an extensive drug history, had "three abortions", had
27 "attempted suicide", had severe marital problems, and had signed
28 an agreement never to sue the Church or the Hubbards. I had

1 been informed by Van Schaick that all of the foregoing informa-
2 tion came from her confidential, "auditing" or "confessional
3 files" and that it was a regular practice of the Church to send
4 such a letter to any person claiming refunds or to their
5 counsel. Van Schaick stated that the auditing information had
6 been given in strict confidence but that the Church, pursuant to
7 written policy, regularly utilized such information to block
8 legal recourse and for other purposes including blackmail and
9 extortion even though it also had a written policy covering
10 refunds.

11 5. Shortly after the receipt of the foregoing
12 letter, I received several anonymous telephone calls suggesting
13 that representation of Van Schaick was a dangerous matter, that
14 no one "messes with the Church", that if I had any doubts about
15 this issue, to contact other people who had sought to "inter-
16 fere" with the Church. During September and early October,
17 1979, I, as a result of all of the foregoing, was involved in an
18 active and extensive investigation of the allegations made by
19 Van Schaick in order to determine the propriety of a lawsuit
20 against the Church. Because of the many strange events that
21 occurred during this period of time in connection with this
22 investigation, I concluded that the Church or its agents were
23 monitoring my activities, telephone calls, and my investi-
24 gation. Among the numerous incidents that confirmed this were
25 several occasions when I observed individuals following me,
26 defamatory calls were made to various clients shortly after I
27 had called these clients on the phone, and an employee at the
28 small airport where I maintained any airplane observed uniden-

1 tified individuals viewing the airplane and seeking information
2 about it.

3 6. Between that date and the ensuing several months,
4 Van Schaick, was allegedly subjected to numerous incidents of
5 personal harassment involving the surveillance of her home and
6 her child, being run off the road in her car, numerous telephone
7 calls to her neighbors suggesting that she was an unfit mother,
8 calls to her employer resulting in the loss of her job as a
9 waitress, attempts to convince her that I was engaging in harass-
10 sive conduct against her, attempts to separate her from her
11 husband, and other forms of harassment. In one instance, she
12 states that the Church sent an agent from Los Angeles to con-
13 vince Van Schaick that the "harassive things" being done to her
14 were initiated by me! (A copy of that agent's note is attached
15 as Exhibit 5.)

16 7. In November 1979, nine of the highest officers of
17 the Church of Scientology were convicted of a variety of crimes,
18 and approximately 30,000 documents seized by the F.B.I. from the
19 Church were released to the general public. I sent an employee
20 to the Federal Court in Washington to copy thousands of these
21 documents. These documents in large part verified the
22 allegations of Van Schaick and validated my belief that the
23 Church was responsible for the numerous inexplicable and harass-
24 sive incidents that had occurred in the prior several months.
25 The documents revealed a 15-year pattern of infiltration, bur-
26 glary, bugging, harassment, and elaborate policies and
27 operations to commit the foregoing pursuant to specific and
28 detailed training manuals. The documents also contained hun-

1 dreds of documents pertaining to the use of auditing information
2 by the Church against individuals such as Van Schaick for the
3 purpose of blocking and frustrating their legal rights, even
4 specifying the use of extortion and blackmail. In fact, the
5 specific written operations authorized by Mary Sue Hubbard to
6 conduct this type of operation were among these documents.

7 8. During the same period of time, I conducted an
8 extensive legal analysis and case research involving the Church
9 of Scientology and learned that the publications of the Church
10 of Scientology had been declared fraudulent in the case of
11 United States v. Article or Device, 333 F.Supp. 357 (D.D.C.,
12 1971) and that the Church had never complied with the decree in
13 said case. Further, I learned that the Church had brought in
14 excess of 100 cases against a variety of individuals and
15 entities for the purposes of frustrating the legal rights of
16 those parties and for the purpose of harassing them pursuant to
17 a specific written policy of the Church which calls for the use
18 of the judicial system to harass and destroy critics.

19 9. Finally, after approximately six months of
20 research and investigation at a cost in excess of \$20,000.00, we
21 decided to bring a class action suit against the Church of
22 Scientology to recover not only for the damages inflicted on Van
23 Schaick, but also to seek relief for the class as a whole, for
24 the failure of the Church to comply with the Article or Device
25 decree. That suit was initiated on December 13, 1979, resulting
26 in unsolicited contact by the news media to Van Schaick and
27 me. After the news relative to the class action suit was dis-
28 seminated in the press, the floodgates unexpectedly and surpri-

1 singly opened. My office was literally swamped in a period of
2 weeks with hundreds of telephone calls by a variety of indivi-
3 duals and organizations including parents whose children had
4 committed suicide while in the Church, individuals who had been
5 hospitalized as a result of Church involvement, authors,
6 reporters, individuals who had been allegedly defrauded by the
7 Church, various law enforcement agencies, and other assorted
8 contacts.

9 10. After the commencement of the Van Schaick action,
10 the Church immediately attempted to infiltrate the class with an
11 agent posing as a prospective client (see affidavit of Garrity
12 attached as Exhibit 6), intensified its harassment of individ-
13 uals associated with me, attempted to disrupt non-Scientology
14 cases I was involved in, and generally initiated a campaign of
15 unrelenting personal and legal harassment. This campaign
16 included the following:

17 a) Approximately three weeks after the
18 commencement of the Van Schaick case, without filing a counter-
19 claim in that action, and without filing a Motion to Dismiss
20 within the time allowed by the rules, the Church initiated a
21 lawsuit in the Federal District Court in Nevada against Van
22 Schaick, Kevin Flynn, (my brother and an employee of my office),
23 Thomas Hoffman, Esq., (a colleague), and Edward Walters, (a
24 client). That suit alleged a conspiracy by these individuals to
25 deprive the Church of its First Amendment rights. The suit was
26 dismissed by the Federal Court within 120 days.

27 b) At the same time as the filing of this
28 action, the Church filed in succession four separate bar com-

1 complaints against me alleging a variety of things including con-
2 spiracy to violate the Church's First Amendment rights, the
3 unlicensed practice of law by Kevin Flynn, and a variety of
4 other charges. The first three complaints were filed on January
5 15, 1980, February 7, 1980 and April 3, 1980, all of which were
6 dismissed on April 10, 1980 by the Massachusetts Board of Bar
7 Overseers. (See Exhibit 7 attached.) On November 19, 1980, the
8 Church filed yet another complaint which was dismissed on May 4,
9 1981. (See Exhibit 8 attached.)

10 c) After the dismissal of the Federal Nevada
11 action, the Church then commenced an action against Van Schaick,
12 Kevin Flynn, Edward Walters, and other clients of mine in the
13 state court in Nevada, which was nearly identical to the federal
14 action. As to Van Schaick and Kevin Flynn, this suit was also
15 dismissed.

16 d) The Church also filed an action against me
17 and four of my clients in the Massachusetts Suffolk Superior
18 Court alleging that the clients had stolen materials from the
19 Church of Scientology of Boston and turned them over to me.
20 These materials primarily included the auditing files of the
21 four clients who had left the Boston Church and taken their
22 auditing files with them because they were aware the Church used
23 them for purposes of blackmail. Also allegedly taken were some
24 financial graphs and some Sea Org organizations. I stipulated in
25 open court to filing the voluminous auditing files under seal
26 with the court, returning the financial graphs, and maintaining
27 possession of the Sea Org communications. The court adopted
28 this offer and issued an injunction based upon it. In subse-

1 quent litigation around the United States, particularly in the
2 recent case of the Church of Scientology v. Gerald Armstrong,
3 California Superior Court, Los Angeles, C420153, the Church has
4 attempted to use this litigation and the stipulated injunction
5 to misinform and mislead the court into the belief that I had
6 behaved unethically as reflected by the injunction, when in
7 fact, I stipulated to the injunction, and the suit was prose-
8 cuted for the purpose of harassing me pursuant to the written
9 policy of the Church.

10 e) Subsequently, the Church filed an additional
11 action against me in the Las Vegas state court alleging essen-
12 tially that I was engaged in a conspiracy against the Church and
13 abusing judicial process. Church counsel attempted to procure a
14 false affidavit from an ex-member to support the case. (See
15 Exhibit 6 at page 8.) The court granted my Motion for Summary
16 Judgment in that action.

17 f) Between January and May, 1980, I was sub-
18 jected to hundreds of instances of personal harassment, which I
19 believe, based upon the Friske and Garrity affidavits and other
20 information, to have been conducted by the Church. These
21 included inter alia, contacting my insurance agent and informing
22 the agent that I had murdered the husband of one of my clients,
23 making a bomb threat to my building resulting in its evacuation,
24 throwing rocks at my building, sending a post card threatening
25 to poison me, harassive telephone calls at all hours of the day
26 and night to me, my wife, and my children, making obscene tele-
27 phone calls to neighbors and suggesting in these calls that I
28 was making them, and process servers arriving at my home at all

1 hours disturbing my wife and children. (See generally,
2 Exhibit 9.)

3 g) Between approximately November, 1979 and up
4 to and including at least May, 1982, the Church allegedly stole
5 approximately 20,000 documents either directly from my office or
6 from a trash dumpster in my private office condominium compound.
7 This theft is established by the following evidence. Kevin
8 Tighe formerly of the Guardian's Office has testified under oath
9 that he stole documents from my law office garbage. (Exhibit
10 10.) Warren Friske, former head of B-2 in Boston, admits he
11 sorted the stolen documents and sent the materials to the
12 U.S.G.O. and to CSC's attorneys. (Exhibit 11.) Joe Lisa,
13 former head of the U.S.G.O., has admitted in a sworn deposition
14 that he ordered the document theft operation. (Exhibit 12.)

15 11. Between January and May, 1980, hundreds of former
16 Church members contacted my office seeking legal recourse
17 against the Church. One of these individuals, Tonja Burden, had
18 worked directly for L. Ron Hubbard, who had ultimate and abso-
19 lute control over all Church activities. Burden, between the
20 ages of 13 and 17, worked for the Church without receiving any
21 education, essentially served for a long period as Hubbard's
22 personal slave, dressing and undressing him, and was involved in
23 coding and de-coding telexes in double and triple codes
24 regarding operations against the United States government, state
25 agencies, and numerous individuals. She was defrauded of
26 approximately five years of labor, a high school education, was
27 made to sign promissory notes in the thousands of dollars, she
28 was tendered a bill in the amount of approximately \$61,000.00,

1 was subsequently kidnapped, harassed and taken over state lines
2 when she left the Church, and was generally tortiously injured
3 by the Church without receiving the benefits promised to her and
4 based upon false representations made to her. With co-counsel
5 in Tampa, Florida, we commenced an action in the Federal
6 District Court on or about April 25, 1980 on behalf of Ms.
7 Burden. This was only the second suit initiated by my office in
8 connecton with Scientology litigation. Yet, most of the items
9 referred to in paragraph 10 against my office were either in
10 process, completed, or being planned. The Church proceeded to
11 literally swamp the court docket with motions, pleadings, and
12 discovery, the great bulk of which motions have been denied,
13 resulting in a massive amount of paper that stands approximately
14 two feet high to date. Although ex-Scientologists have come
15 forward and acknowledged a consistent pattern of abuses against
16 individuals such as Van Schaick and Burden with regard to the
17 wrongful dissemination of auditing information, fraudulent and
18 deceptive recruitment and sales practices, campaigns of harass-
19 ment pursuant to the "Fair Game Doctrine" and other such
20 operations, and thousands of documents exist to support such
21 allegations, the Church and its counsel have engaged in a
22 pattern of litigation designed to wear down the plaintiffs,
23 their counsel, and the court system rather than attempt to
24 resolve the injury claims in a judicious and good faith approach
25 based upon specific and extensive evidence. The latter strategy
26 is reflected by the activities of the Church and its correspon-
27 dence to me prior to the commencement of the Van Schaick action
28 ///

1 as well as the aforesaid dismissed lawsuits, bar complaints, and
2 harassment techniques.

3 12. Between May, 1980 and December, 1980, my office
4 continued to be besieged with contacts from former members,
5 parents, state and federal law enforcement agencies, the news
6 media, etc. with regard to the activities of the Church. During
7 that period of time, my office brought several additional
8 actions in the Massachusetts Superior Court on behalf of former
9 members who sought to obtain legal redress against the Church.
10 During the same period of time, the continuous theft of docu-
11 ments from my office and compound took place and the general
12 campaign of harassment continued. The hundreds of instances
13 involved in this harassment are too extensive to set forth in
14 this affidavit but they consisted of a general pattern of what
15 has been previously described including contacts with non-
16 Scientology clients. (See several statements of clients
17 attached hereto as Exhibit 9.) Throughout this period of time
18 the Church continually attempted to take my deposition and depo-
19 sitions of my employees and colleagues on numerous occasions in
20 different cases.

21 13. In January, 1981, after living through a year and
22 a half of the activities and conduct previously described, I
23 flew to Los Angeles, California, together with my colleagues,
24 for the purpose of discussing settlement of the Scientology
25 litigation with Church counsel. During these settlement dis-
26 cussions, the Church agreed to repay all of the monies paid by
27 two claimants, Donald and Peggy Bear, in the amount of approxi-
28 mately \$107,000.00. Although releases were signed and the

1 Church represented to numerous courts that it had a policy to
2 refund monies paid to it, the Church failed to deliver a check
3 for the proceeds, the settlement negotiations fell through, and
4 a suit was later commenced on behalf of the Bears. (See Exhibit
5 14 attached.) At the time of the preparation for these settle-
6 ment negotiations, my office prepared an extensive analysis of
7 approximately 50 cases that it was considering filing on behalf
8 of former members, which analysis related to the costs of such
9 litigation for both sides, the factual issues involved in the
10 various cases, peripheral issues such as probate matters, media
11 problems, etc., That analysis was prepared specifically for
12 these settlement negotiations. The analysis was subsequently
13 stolen from our offices and later became the subject of an
14 additional bar complaint and a suit brought by the Church
15 against my colleagues and I in the Los Angeles District Court,
16 discussed infra.

17 14. After the settlement negotiations failed, and
18 after spending several weeks in Los Angeles, we returned to
19 Boston and prepared to conduct a conference in May 1981, for the
20 purpose of meeting with several lawyers in connection with the
21 proposed commencement of some of the 50 cases included in the
22 settlement analysis. Portions of the settlement analysis were
23 included in a packet of information given to the lawyers who
24 attended the May conference. Those documents were also subse-
25 quently stolen by the Church of Scientology from our offices or
26 our trash dumpster. At the conference, attended by approxi-
27 mately eight attorneys, the nature of Scientology litigation was
28 explained, fee relationships were discussed involving the tra-

ditional contingent fee type relationship and a sharing of the fees between the attorneys based upon the amount of work done on each case. Other peripheral issues set forth above in the settlement analysis were discussed. This meeting was infiltrated by an agent of the Church posing as a client, Ford Schwartz, on behalf of the Church. (See attached Exhibit 15.) The Church, therefore, was aware of the nature of the meeting, what was discussed, and the fee relationships that existed between the clients and the attorneys.

15. Between May, 1981 and July, 1981, Kevin Flynn, who had ceased being an employee of mine in mid-1980 and who had commenced working as an independent contractor, submitted a proposal to me and my colleagues whereby Kevin Flynn's corporation, Flynn Associates Management Corporation, would perform services on behalf of the various attorneys as a researcher and investigator in consideration of receiving a percentage of the funds recovered in the cases. After research by me and my colleagues, the proposal was rejected, although ethical opinions of several states indicated that such a proposal was not improper. This proposal was also stolen from the offices of mine and/or the trash dumpster in the private office compound.

16. During the summer of 1981, as a result of the ongoing theft of documents from my office and compound, most of which constituted attorney-client communication and/or work-product, the Church knew that I and counsel from various other states were considering the commencement of various actions in New York, Washington, and Los Angeles. It also knew that Flynn Associates Management Corporation played no role in connection

1 with these suits, that the May meeting among counsel was ethi-
2 cally proper, and that I was still seeking to resolve the cases
3 without litigation.

4 17. In June, 1981, Church counsel again initiated
5 settlement discussions, this time with my co-counsel in the
6 Burden case in Tampa, which resulted in a series of correspon-
7 dence between me and Church counsel. (See attached Exhibit
8 16.) In fact, the Church offered 1.6 million dollars to resolve
9 all existing and impending litigation, and I accepted their
10 offer on behalf of the various clients involved, in a good faith
11 effort to resolve the entire matter. My motivation in accepting
12 this settlement offer of the Church on behalf of my clients
13 involved numerous considerations including: a) the desire of
14 clients and counsel to end the torrent of legal and personal
15 harassment; b) the expense and time consumption inherent in the
16 litigation for all parties; c) the promised efforts of the
17 Church to reform and discontinue many of its unlawful practices;
18 and, d) the financial remuneration of clients and counsel.

19 18. Between approximately April and June, 1981, I was
20 contacted by the City of Clearwater to prepare a report relative
21 to the Church of Scientology and the tax-exempt aspects of orga-
22 nizations such as the Church. Because of the continued theft of
23 materials from my office, the Church was fully aware of the fact
24 that various City officials had contacted me during that period
25 of time. The Church therefore knew, through the acquisition of
26 illegally obtained information, when it made its 1.6 million
27 dollar offer to settle all Scientology-related litigation
28 matters, that hundreds of individuals had contacted our office,

1 that several counsel in various areas of the U.S. had agreed to
2 undertake litigation on behalf of injured clients, that the City
3 of Clearwater was commencing an investigation into the Church,
4 that it had been engaged in a two-year campaign of legal and
5 personal harassment against me and my office, that it had been
6 engaged in at least a ten-year pattern of burglary, larceny,
7 obstruction of justice, etc., of which its highest leaders had
8 been convicted, and that there were thousands of people across
9 the United States who were seeking refunds from the Church.
10 Because of the close monitoring and surveillance of my office,
11 the Church also knew that my colleagues and I were willing to
12 resolve the litigation primarily because of our desire to termi-
13 nate the persistent harassment of us and our clients. At this
14 point in connection with the litigation, I had personally
15 expended in excess of \$200,000.00.

16 19. Upon information and belief provided by recently
17 defected members of the Church, in the summer of 1981, when all
18 of these matters were occurring, an internal power struggle took
19 place within the Church resulting in the purge of several
20 highly-placed members and the resulting take-over of the Church
21 by several young members of the "Commodore's Messenger Org," who
22 had served personally for L. Ron Hubbard throughout their teen-
23 age years, who were then approximately 21 or 22 years of age,
24 and who were fanatical adherents of Hubbard. These individuals
25 who took over the Church adopted a plan in the summer of 1981 to
26 conduct an all-out campaign against me and my clients pursuant
27 to the "technology" of the Church doctrine, to wit, the Fair
28 Game Doctrine, to destroy me and all opposition to the Church.

1 Upon information and belief, the foregoing involved a highly
2 secretive written plan adopted by the highest members of the
3 Church to revoke the offer of settlement, revert to "Hubbard
4 technology," and to attack and destroy me pursuant to the
5 following Hubbard policies:

6 Don't ever defend. Always attack. Find or
7 manufacture enough threat against them to
8 sue for peace. Originate a black PR cam-
9 paign to destroy the person's reputa and to
10 discredit them so thoroughly they will be
11 ostracized. Be very alert to sue for
12 slander at the slightest chance so as to
13 discourage the public presses from mention-
14 ing Scientology. The purpose of this suit
15 is to harass and discourage rather than to
16 win.

17 (Level O Checksheet attached as Exhibit 17.)

18 Pursuant to this plan, the Church then embarked on a
19 campaign beginning in August, 1981, and continuing up to the
20 present date, to "attack", "sue", and "destroy" me. This cam-
21 paign has included the following:

- 22 a. In August, 1981, the Church, through its counsel,
23 Harvey Silverglate, filed a bar complaint against
24 me and my colleagues attaching numerous documents
25 that had been stolen from my office and compound.
26 The thrust of this complaint was that I was
27 unlawfully selling shares of Flynn Associates
28 Management Corporation to finance prospective

1 lawsuits against the Church. Although the Church
2 knew that this allegation was false, the Church
3 and its counsel wove together the settlement
4 analysis prepared in January, 1981, the materials
5 assembled for the May conference, and the pro-
6 posal of Kevin Flynn, then attempted to create a
7 false and deceptive impression with the Board of
8 Bar Overseers and subsequently in the courts. The
9 Church knew at the time of this bar complaint
10 that the allegations of its counsel, Silverglate,
11 were false, because it had agents who had
12 attended the May conference, it had stolen the
13 settlement analysis at the time it was prepared
14 in January, 1981, and the Church had stolen the
15 Kevin Flynn proposal when it had been prepared
16 and rejected in June, 1981.

17 b. In addition to this bar complaint, the Church and
18 its counsel then proceeded to file an additional
19 three bar complaints against myself and my
20 colleagues, including, inter alia, the allegation
21 that I improperly attempted to avoid service of
22 process by one of the many process servers in
23 connection with suits and depositions that the
24 Church was attempting to initiate against our
25 office. These bar complaints were filed through-
26 out the period from August to December, 1981.
27 Notwithstanding the foregoing complaints, I have
28 received a letter from the Board stating that it

1 does not consider that I have any "Complaints"
2 presently against me. (See Exhibit 18.)

3 c. At the same time that the bar complaints were
4 being filed, the Church was engaged in operations
5 to steal documents from the trash of at least one
6 of the members of the Board of Bar Overseers.
7 (See affidavit of Warren Friske attached as
8 Exhibit 3.)

9 d. In August, 1981, the Church commenced an action
10 in the Los Angeles Federal District Court through
11 one of its members, Steven Miller, against me, my
12 brother, Kevin, a medical doctor, and several
13 others, on the theory that the defendants had
14 "deprogrammed" Miller and violated his civil
15 rights. At the time of the filing of the suit, I
16 had never heard of Steven Miller and had never
17 had any contact with him before. The attorneys'
18 fees in connection with the defense of that case,
19 upon information and belief, are currently in
20 excess of \$200,000.00, which have been paid by
21 the parents of Steven Miller, I have also sus-
22 tained attorneys' fees and expenses in connection
23 with the defense of that case and other liti-
24 gation initiated by the Church of Scientology.

25 e. In August, 1981, the Church commenced an action
26 in the Boston Federal District Court through its
27 members, Ellen and Chris Garrison, on the same
28 theory of deprogramming. This suit was brought

1 against Kevin Flynn and Paulette Cooper after
2 specific planning and meetings were held by the
3 Church to bring this suit against these indivi-
4 duals for the purpose of harassing them and my
5 office. (See Affidavit of Warren Friske attached
6 as Exhibit 3.)

7 f. During the same period of time, and in the
8 ensuing months, the Church filed motions to dis-
9 qualify me in the cases of Garrity, et al. v. The
10 Church of Scientology, Los Angeles Federal
11 District Court, Burden v. Church of Scientology,
12 District Court in Tampa, and in the Van Schaick
13 case. These Motions for Disqualification were
14 all part of the plan to personally and legally
15 harass me and my colleagues.

16 g. Between August, 1981 and December, 1981, the
17 Church literally swamped the court dockets in
18 every case that it was involved in, including
19 both those it had initiated and those that had
20 been brought by claimants, with hundreds of
21 pleadings, motions, discovery requests, etc. An
22 examination of the dockets in almost any of the
23 pending cases will illustrate the intense cam-
24 paign of legal harassment specifically adopted by
25 the Church during this period of time to destroy
26 me, my office, and my clients.

27 h. My office utilized a long distance telephone code
28 which unauthorized individuals, allegedly the

1 Church, intercepted and thereafter used to charge
2 in excess of \$1,000.00 in telephone calls to our
3 code. In a similar "operation," it has been
4 alleged that the Church intercepted the code of a
5 third party in California and made telephone
6 calls to our clients charging the calls to the
7 third party's code. All of these matters and
8 many others have been turned over to the F.B.I.

9 i. After we spent in excess of one hundred hours
10 defending the Motions to Disqualify filed in the
11 Garrity, Van Schaick, and Burden cases, the
12 Church dropped these Motions and instead under-
13 took a new round of lawsuits against my office.
14 The Church commenced an abuse of process action
15 in the Los Angeles Federal District Court in
16 connection with the Garrity, et al. case and also
17 brought another civil rights action against me
18 and the City of Clearwater in the Tampa Federal
19 District Court.

20 20. The Church timed commencement of the abuse of
21 process action in the Los Angeles Federal District Court to
22 coincide with certain hearings being conducted by the City of
23 Clearwater involving the Church of Scientology in which our
24 office was involved. In connection with these hearings, the
25 Church adopted a specific operation to harass me as follows:

26 In the second week in March, 1982, the
27 Clearwater hearings were scheduled to begin
28 on April 21, 1982. On March 25, Church

1 counsel in the case of Cazares v. Church of
2 Scientology, Circuit Court in Daytona, sent
3 a letter to me scheduling my deposition for
4 April 23, 1982 in Tampa during the middle of
5 the hearings. Although the hearings were
6 subsequently continued until May 5, 1982, on
7 April 19, 1982, while appearing in the
8 Burden case in Tampa, I was served with a
9 deposition subpoena. I filed a Verified
10 Motion to Quash the Subpoena stating that
11 the demands of my law practice prevented me
12 from remaining in Florida throughout the
13 "time" required for the deposition, 2:00
14 p.m. on Friday, April 23, to continue from
15 day-to-day over the week-end and the follow-
16 ing Monday, as required by the deposition
17 subpoena. I sent a letter on two occasions
18 to Church counsel indicating that I could
19 not appear for the deposition, that I had no
20 personal knowledge of the subject matter of
21 the case in which the deposition was to be
22 taken, but that I would be willing to
23 schedule another date when I would
24 voluntarily appear. Subsequently, after the
25 Church learned that the hearings would be
26 continued to May 5, 1982, it issued a second
27 subpoena, from the Los Angeles Federal Court
28 in the case of Church of Scientology v.

1 F.B.I. I had no personal knowledge relevant
2 to this case but the Church sought to take
3 my deposition, again during the middle of
4 the hearings. I communicated to counsel in
5 that case that I would be unable to appear
6 on that date. Subsequently, during the
7 middle of the Clearwater hearings, the
8 Church filed motions to hold me in contempt
9 in the Los Angeles Federal District Court
10 and in the Daytona Circuit Court because of
11 my failure to appear at the depositions. In
12 connection with the Daytona contempt pro-
13 ceeding, I informed the Court of the fore-
14 going, informed the Court that under Florida
15 law I was immune from service in Florida,
16 under the Florida Rules of Civil Procedure
17 my deposition had to be taken in
18 Massachusetts, but that I was still willing
19 to appear without need of going forward with
20 the contempt matter. Notwithstanding the
21 foregoing, and after the Church counsel
22 specifically misrepresented the facts, with-
23 out a trial, without any witnesses being
24 called at the contempt matter, and without
25 complying with Florida rules with regard to
26 "indirect criminal contempts," Church
27 counsel procured a contempt finding against
28 me from the Court. The matter was appealed

1 and the appellate court reversed and vacated
2 the finding of contempt by the trial
3 court. The trial court judge has since left
4 the bench after being implicated in an
5 unrelated bribery scheme.

6 21. In the face of this harassment and abuse, the
7 intention of our office throughout the subject litigation has
8 been to obtain redress on behalf of our clients for alleged
9 fraud in the taking of their money and labor and for outrageous
10 conduct in blocking their access to judicial relief. We submit
11 that the Church of Scientology operates based on policies such
12 as "Fair Game" and "Attack the Attacker" because it must use
13 such means to perpetuate its fraudulent sales and recruitment
14 practices. These operating policies of the Church carry over to
15 its activities and conduct in dealing with the judicial system
16 and attorneys, such as ourselves who represent clients against
17 the Church. We are among many attorneys and judges who have
18 been attacked by the Church through motions for disqualifi-
19 cation, lawsuits, bar complaints, and personal harassment. The
20 Assistant U.S. Attorney in the Washington criminal cases,
21 several federal judges, and the attorney for the F.D.A. are such
22 examples. (See attached Exhibit 19.) While utilizing the
23 operational policies such as Fair Game, the Church presents a
24 religious front to the Court in order to frustrate legitimate
25 claims for tortious injury and to create the appearance of a
26 personal conflict amongst the lawyers in the swamping of the
27 dockets with every conceivable filing. Abuse of the legal
28 system is reflected by the massive litigation instituted by

1 Scientology in courts throughout the United States. (See Lexis
2 scan attached as Exhibit 20.)

3 22. My colleagues and I have never before been sub-
4 jected to the legal harassment which has occurred in the subject
5 litigation. Our background is not one of using the judicial
6 system abusively or without just cause. I was ranked first in
7 my class in law school, served as Editor-in-Chief of the Law
8 Review, served as a law clerk to a Justice of the Massachusetts
9 Supreme Judicial Court, have been married for 16 years with 3
10 children, and I have always endeavored to practice law with
11 discretion, professional restraint and within the bounds of the
12 canons of ethics. In contrast, the highest officials of the
13 Church have served time in Federal Prison, there are literally
14 thousands of individuals and families seeking legal redress, and
15 the fraudulent, tortious, and often times criminal activities
16 and policies of the Church are becoming increasingly evident.
17 These victims have come to us in the hundreds, often with sub-
18 stantial financial claims and evidence of overt physical and
19 mental abuse. As a result of my assistance to these people, I
20 have been "declared" an "enemy" by the Church and appear on its
21 "enemies list." (See Exhibit 21 attached.)

22 23. It has always been the policy of my office to
23 resolve claims against the Church of Scientology without liti-
24 gation. The efforts at settlement between January and July, 1981
25 were such an example. The Church is now using those confidential
26 settlement negotiations to further attack me, although the
27 Church insisted in writing on their confidentiality, and
28 accepted, but later reneged upon, the settlement.

1 24. It is the intent of my office and clients to
2 obtain legal redress for legitimate claims in the context of
3 substantial supporting evidence. It is not my intent to use the
4 judicial process to harass the Church. The fact that the Church
5 has a written policy mandating such judicial abuse, together
6 with a 20-year history of employing it, is evidence of the fact
7 that the Church, not myself or my clients, is intent upon
8 creating a distorted and false perception of the nature and
9 purposes of each of the Scientology related cases.

10 25. I am not collaborating with forces who are trying
11 to destroy freedom of religion and churches in America.

12 26. I am not collaborating with anyone using brutal
13 "deprogramming" and "depersonalizing" techniques. I have never
14 deprogrammed or depersonalized anyone.

15 27. I have exercised my First Amendment rights to
16 speak out and oppose an organization whose top leaders have gone
17 to prison. However, I have never sought to manipulate the media
18 or use libel, forgery, or other improper means in connection
19 with any of the litigation.

20 28. I have made no fraudulent representations of any
21 nature or description but have merely sought to expose the mis-
22 representations made by the Church of Scientology.

23 29. Dr. John Clark has never been part of any
24 operations of FAMCO of any nature or description, nor has Kevin
25 Flynn through FAMCO or otherwise, attempted to involuntarily
26 kidnap or brutalize anyone.

27 30. The charge that I have solicited an individual
28 named "Jim Gray" to enlist him to sell shares in FAMCO is

1 totally false. Gray was never offered any position, no shares
2 were ever offered to him, and I have no idea why he would make
3 such allegations in a so-called "sworn affidavit."

4 31. The charge that I have solicited clients in
5 connection with the Church of Scientology is absurd. Indeed,
6 the reverse is true. There are thousands of Scientologists
7 throughout the United States seeking to obtain legal counsel to
8 obtain redress against the Church. The problem is that it is
9 very difficult to get lawyers to take on such cases. I have
10 been unfortunately refusing clients, not soliciting them.
11 Although my law firm has endeavored to help all of these people,
12 and has never solicited any of them, we are, in fact, incapable
13 of representing the thousands of people who desperately need
14 representation.

15 32. The Church of Scientology claims that I "resorted
16 to the use of force and coercion in the form of
17 psychiatric...not unlike the insidious, painful brainwashing
18 techniques on American servicemen by Chinese Communists during
19 the Korean War." First of all, I have never advocated nor would
20 I ever participate in any such activity. Second, "brainwashing"
21 is a technique used and taught by the Church in its G.O. intel-
22 ligence courses. (Exhibit 22.) Third, as explained above, I
23 never met nor even heard of Steven Miller prior to his filing a
24 Church sponsored lawsuit against me which has since been dis-
25 missed.

26 33. The probate case relating to Ronald DeWolf and
27 the "missing person status" of L. Ron Hubbard was brought for
28 the simple reason that L. Ron Hubbard's own attorney, Alan

1 Goldfarb, stated that L. Ron Hubbard was missing, and that he
2 could not appear in one of the many suits that had been brought
3 against him because no one knew where he was and no one from the
4 Church of Scientology had communicated with him since February
5 1980. It was the conduct of Hubbard's own lawyers and the group
6 that now run the RTC (Religious Technology Center) and the
7 failure of Hubbard to appear and defend himself in Court or even
8 to appear and defend or assist his wife for that matter, which
9 resulted in the probate case being brought. It was only after
10 Hubbard filed a legal declaration, the day before a trustee was
11 to be appointed in the probate case, that the Court held that L.
12 Ron Hubbard was not a missing person.

13 34. The finding of contempt against me was one of the
14 numerous legal proceedings brought against me at the same
15 time. The Church of Scientology fails to state that I did not
16 even appear and defend the contempt proceeding because of the
17 onslaught of other harassment brought against me by the Church,
18 and, later when I moved to vacate the order, the judge stated
19 that no bad faith or misconduct was involved, but merely a tech-
20 nical violation of one of the court orders regarding disclosure
21 of information about Hubbard.

22 35. The allegations contained in Paulette Cooper's
23 affidavit are perhaps the most absurd portion of the Church of
24 Scientology's charges. Since I was Ms. Cooper's attorney, I
25 feel ethically bound to hold inviolate the communications we had
26 regarding L. Ron Hubbard, other than to say that Ms. Cooper's
27 declaration is totally false. The accompanying declaration of
28 Joseph Flanagan explains how Ms. Cooper came to testify for CSC.

1 36. The idea that Kevin Flynn, Thomas Hoffman, or I,
2 or anyone associated with us, had anything to do with the for-
3 gery of one of L. Ron Hubbard's checks, is simply too fanciful
4 to warrant extensive discussion. Suffice it to say that I
5 brought to the attention of the public and the courts the fact
6 that one of L. Ron Hubbard's checks, in the possession of indi-
7 viduals controlling the RTC, was forged and an attempt to pass
8 it was made at the time in May-June, 1982 when Hubbard wrote a
9 will and in the will turned over control of Scientology to the
10 RTC. It was at the same time that the RTC began to assert total
11 dictatorial control throughout the Church of Scientology. Any
12 intelligent observer can put two and two together to conclude
13 that I would not participate in the forgery of a two-million
14 dollar check and then do everything in my power to investigate
15 it.

16 37. Recently, I received a letter and telegram from
17 Mr. Tamimi, whose sworn declaration was procured by Eugene
18 Ingram, an investigator employed by Church of Scientology, who
19 has been removed from the L. A. Police Force for his purported
20 involvement in assisting narcotic dealers, pimping, and other
21 criminal activities. In the note and telegram Tamini states
22 that the declaration procured by Ingram is false and that he is
23 now prepared to tell the truth. Tamini's declaration, attached
24 to Peterson's declaration, should be viewed with great scepti-
25 cism in light of Tamini's letter and telegram. (A copy of this
26 letter and telegram is attached as Exhibit 23.) This letter has

27 ///

28 ///

1 been turned over to law enforcement authorities to permit fur-
2 ther investigation. This letter was the first communication of
3 any type which I have ever had with Mr. Tamini.

4 Signed under the pains and penalties of perjury
5 this _____ day of July __, 1985 in Boston, Massachusetts.
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7
8

MICHAEL J. FLYNN

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28 PLD/JAT15

Fourth Floor
South Market Building

MICHAEL J. FLYNN

One Financial Hall Marketplace

Boston Massachusetts 02109

Telephone
(617) 523-

July 17, 1979

Assistant Guardian
Guardian's Office
Church of Scientology
c/o FLAG
P.O. Box 23751
Tampa, Florida 33623

Re: La Venda Schaick/Platt/Dukoff

Gentlemen:

Please be advised that I represent the above named La Venda Van Schaick whose previously married name was Platt and whose maiden name was Dukoff.

Mrs. Van Schaick has been involved with the "organization" known as the Church of Scientology both as a staff member and as a public person for the last ten years.

During this period she was engaged in courses given by the organization for which she paid the total amount of \$12,896.75. This was required by the organization for courses, books and auditing for which Mrs. Van Schaick has receipts.

At various times, the organization had confiscated some of these materials for which Mrs. Van Schaick had paid. Mrs Van Schaick's mother and father, who are a psychologist and a retired Protestant Minister, along with her husband who is a State Law Enforcement Officer, have been witness to some of Mrs. Van Schaick's activities within the organization.

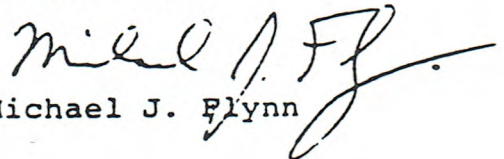
Funds paid by Mrs. Van Schaick were sent to the following locations: Church of Scientology, Las Vegas, Nevada; Mission of the Meadows, Las Vegas, Nevada; FLAG, Clearwater, Florida; and A.S.H.O., Los Angeles, California.

It is the intention of Mrs. Van Schaick to recover the total amount paid to your organization. Please send a check payable to La Venda Van Schaick to the undersigned in the amount of \$12,896.75. If such a check is not forthcoming within 14 days from receipt of this letter, or if I do not receive a reply from your organization within that period of time, I will commence suit immediately in the United States District Court in Boston.

I would hope that this matter can be amicably resolved and that releases can be exchanged between the parties without the recourse to a law suit.

I will await your reply.

Sincerely,


Michael J. Flynn

MJF/laf

Board Finance Officer
Church of Scientology of Calif
P.O. Box 13751
Tampa, Florida 33613

Michael J. Flynn
One Faneuil Hall Marketplace
Boston, Massachusetts 02101

August 14, 1978

Dear Mr. Flynn,

I am responding to your letter dated July 17th to the Assistant Guardian, as it is my responsibility to handle this type of request.

We have La Vonda Schaefer/Platt/Dukoff as La Vonda Dukoff in our records. In February of 1977, she paid for and received a course for \$475.00, the Advanced Executive Secretary Course, and also received up to \$10.00 in course materials. Total paid in by La Vonda was \$485.00, and she also received service and packs for course value of that amount.

Upon enrolling in course, a Church member enrolls, and agrees to abide by the policies of the Church.

Return of used donation, which is a refund, is promptly repaid to any dissatisfied student, if requested within a three month time period from the end of the last service rendered. La Vonda did receive her service in 1977, and as you can see, it has been well over two years.

So, as you can see, the claim by La Vonda does not conform with Church policy. If you have any further questions regarding the above matter, please let me know further information, please do let me know.

Thank you.

Sincerely,

Jackie McGinley
Jackie McGinley
Board Finance Officer
The Service Organization
Church of Scientology of Calif.

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

LA VENDA VAN
SANCHEZ, et al.

Plaintiffs

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al,

Defendants

CIVIL ACTION
NO. 79-2491-G

AFFIDAVIT OF WARREN H. FRISKE

I, Warren H. Friske, hereby depose and state
as follows under the pains and penalties of perjury:

1. I have personal knowledge of the facts set
forth in this affidavit and if called upon to testify in
Court, could do so of my own personal knowledge.

2. I am 34 years old and reside in Lynn, Massa-
chusetts.

3. Between the years 1972 and 1982, I was a member of the Church of Scientology of Boston, ("Boston"). In 1976, I was recruited by Deac Finn to join the Guardian's Office, ("G.O."), which I joined after the F.B.I. raid in July, 1977. I became the Branch 2 Director and the Director of the Combat Information Center, ("C.I.C."), both of which are in the G.O. My duties as Branch 2 Director primarily related to internal security, and my duties as C.I.C. Director primarily related to maintaining G.O. files.

4. While working in the G.O., I was involved in numerous intelligence gathering operations and programs against Attorney Michael J. Flynn, LaVenda Van Schaick, Larry Stifler, Janet Troy, Marjorie Hansen, the Lebowitz family, Jose Baptista, and others. ~~Some of these operations~~ and programs are outlined in this affidavit, but this affidavit is not inclusive of all operations and programs that I was involved in while I was in the G.O., because such operations and programs are too extensive and comprehensive to include in this affidavit.

5. In general, all members of the Boards of Directors of all corporations, including Boston, are required to sign undated resignations in advance of their appointment as a director. For example, in Boston the G.O. prepared a "parallel corporation", of which I served as

one of the directors and for which I was required to sign an undated resignation in advance. The purpose of this corporation was to have it available to transfer all of the assets of Boston in the event that the assets became reachable through legal process.

6. I saw numerous files in the G.O. pertaining to intelligence reports on Paulette Cooper. I saw some files relating back to the period in the mid 1970's involving Paulette Cooper which files contain documents relating to the burglary of the office of Dr. Stanley Cath, Paulette Cooper's psychiatrist, and in connection with operations against Cooper. In October, 1977, the G.O. destroyed, under the direction of a U.S. G.O. Mission, hundreds of sensitive documents relating to Cooper and operations against her. Right up to the time I left the G.O., in March, 1982, there were regular intelligence reports involving Paulette Cooper. From March, 1981 to January, 1982, there were communications, on almost a weekly basis, on the telex line between the U.S. G.O. in California and Boston pertaining to Cooper. For example, it was customarily discussed as routine G.O. policy that the appropriate method of dealing with Cooper was to constantly pressure her and harass her through various means, including the bringing of frivolous lawsuits. In 1981,

the G.O., decided that a lawsuit should be brought against Paulette Cooper and Kevin Flynn in connection with an attempted deprogramming of Ellen and Chris Garrison by Ellen Garrison's parents, the Lebowitz. Even though the G.O. knew at the time of the bringing of the suit, in the summer of 1981, that Paulette Cooper and Kevin Flynn had nothing to do with the Garrison deprogramming, the G.O. dictated the purposes and goals of the suit, the timing of the suit, the parties to the suit and controlled all of the financing of the suit. The suit was brought against Cooper and Flynn to harass them, even though the G.O. knew that they had no personal involvement in the deprogramming.

7. The foregoing Garrison suit was also brought against Kevin Flynn, pursuant to a very specific operation. This operation involved sending Chris Garrison and Ellen Garrison to the office of Kevin Flynn and Attorney Michael J. Flynn, for the ostensible purpose of obtaining information about the Church of Scientology. The two Garrisons were directed, by the G.O., to go to the Flynn office for the purpose of talking to Kevin Flynn and obtaining statements about the deprogramming. The materials obtained in the conversations with Kevin Flynn would then be connected to the Garrison deprogramming, on the grounds that one of the alleged deprogrammers, Joe Flanagan, had told the Garrisons

to either talk to Paulette Cooper or Kevin Flynn if they wanted more information about the Church of Scientology. It was known at the time that the Garrisons went to the Flynn office, that Kevin Flynn and Cooper were not involved in the deprogramming, but it was the intent of the G.O. to "set up the Flynnns" for purposes of pressuring them and harassing them.

8. Operations such as the foregoing and most of the other operations set forth in this affidavit, as well as most operations that I was involved in, while a member of the G.O., were all pursuant to written policy of the G.O. in a Course Pack containing "OPS G.O.". The purpose of these policies is to determine the "position of power" from which an opponent of the Church operates, and or to determine what an opponent of the Church "seeks to protect". In connection with these and other considerations, programs and operations are formulated to "attack" both the position of power and the areas that an opponent seeks to protect. For example, in connection with Michael Flynn, the G.O. conducted almost daily operations against him, for a period of almost 2½ years since he first became involved in litigation against the Church of Scientology. In connection with some of these operations, hundreds of telephone calls were made to many people involving Attorney Flynn, some of which were

of an investigatory nature, and many of which were to discredit and harass him. Some of the phone calls included calls to Phyllis Sequeira, one of Attorney Flynn's old clients and friends, for the purpose of suggesting to her that Attorney Flynn had withheld money from her, in connection with some of the cases that he was involved in on her behalf. Although there was no evidence to support this statement, the idea was to separate Attorney Flynn from this particular client, as well as to attempt to have her begin an investigation of Attorney Flynn and perhaps report him to the Board of Bar Overseers. Another call was made to Philip Chesley, one of Attorney Flynn's friends and insurance agent, suggesting to him that Attorney Flynn had murdered the husband of one of his clients. Calls were made to virtually every attorney, on almost every case that Attorney Flynn had ever been involved in, including the Marides Case, the Kemos Case, the Leff Case, and many others. Calls were made to nearly all of Attorney Flynn's clients, including Martha Leff, Peter Marides, and many others.

9. Other operations against Attorney Flynn, involved an operation to plant an individual posing as an independent private investigator within the Flynn office. This person's name was Chuck Malone, and he contacted Attorney Flynn, stating that his name was Chuck North,

that he was a private investigator researching cults, and that he would like to work freely for Attorney Flynn in connection with his research of cults.

10. In one operation against Attorney Flynn, it was determined to "separate" Kevin Sullivan, one of the lawyers working with Attorney Flynn, from him. It was arranged to have Kevin Sullivan's secretary overhear a conversation between two individuals, one of whom was me, in which we stated that Attorney Flynn was in serious trouble with the Massachusetts Attorney General's office as a result of the documents in our possession which were being brought down to the Massachusetts Attorney General's office. It was our purpose to have the secretary give the information to Kevin Sullivan for the purpose of having Sullivan sever ties with Mr. Flynn. On another occasion a similar arrangement was made in which Patty Flynn and Khurshid Bolt, Mr. Flynn's sister and one of his secretaries, were set up in such a way to overhear a conversation that another one of Mr. Flynn's secretaries in his office was a plant. Operations of this type were discussed on almost a daily basis and sent via telex to U.S. G.O., many of which were approved and many of which were not.

11. In connection with another operation against

Attorney Flynn, in order to separate one of his secretaries from him, it was made to appear that Kevin Flynn, Mr. Flynn's brother, was following the secretary, Silvana Garritano, while she was walking on the street. The G.O. obtained a car similar to Kevin Flynn's, and an individual was set up to approach Silvana as she was walking down the street. As Silvana approached the G.O. agent, she was alerted to the fact that it appeared that someone was following her. At that precise time, a car driven by another G.O. member screeched to a halt, made a sharp u-turn and went screeching down the street.

12. In other operations, Mr. Flynn's clients, such as LaVenda Van Schaick and Tonja Burden, were tailed, numerous calls were made to neighbors from pay telephones, calls were made to the I.R.S. against Mr. Flynn, his banks were regularly called to get bank balances, operations were put into effect against his sister to obtain her trash and place a plant (covert agent) with her boyfriend. The office compound from which Attorney Flynn worked was regularly trespassed upon late at night, for purposes of taking trash from his office compound.

13. Trash was also taken from the street outside the home of Constance Vecchione, of the Board of Bar Overseers, Khurshid Bolt, one of Mr. Flynn's secretaries,

from the Attorney General's office, Dr. Jack Clark, and others.

14. In one instance, an ex-scientologist named Charles Gibbs contacted Attorney Flynn's office which the G.O. learned about from Flynn's trash. Gibbs represented a significant danger to the Church of Scientology because Gibbs had been actually kidnapped and held against his will. Gibbs was paid a refund to keep him away from Flynn.

15. In connection with all of the operations and programs against Attorney Flynn, some of which originated at the local level in the Boston G.O., and some of which originated at the U.S. G.O., information was collected and put together on almost a daily basis and "predictions" as to what Attorney Flynn's activities and intentions were. These were typed up and given, on almost a daily basis, to the various attorneys involved in litigation against him, including Attorney Harvey Silverglate. Mr. Silverglate continually questioned where all of this extremely confidential information was coming from, and he was directed to undertake various courses of action in connection with the pending litigation predicated upon the information obtained.

Silverglate

16. In connection with some of Attorney Flynn's Scientology clients, very specific operations were undertaken

to "separate" them from Attorney Flynn, and to utilize Scientology lawyers to assist in the "separation process". For example, in connection with Jose Baptista, one of Attorney Flynn's Scientology clients, Mr. Baptista's superior, at his place of employment, was called by a G.O. agent impersonating Kevin Flynn. This agent told the superior that Mr. Baptista was greatly indebted to Attorney Flynn and was concerned Baptista might leave the country. At the same time, another G.O. agent obtained the names of various lawyers from Mr. Silvergate and the agent took those names to Mr. Baptista and told Mr. Baptista that he should fire Attorney Flynn, because Attorney Flynn was going to be disbarred and because ~~there were many pending bar complaints against him, some~~ of which had been filed by Mr. Silvergate, and some of which had been filed by the Church, and that Mr. Baptista should hire one of the attorneys whose names appeared on the sheet of paper shown to Baptista. A similar operation of this type was conducted extensively against Silvana Garritano in order to separate Silvana from Attorney Flynn. Again the name of a lawyer given by Harvey Silvergate, Judd Carhart, was given to Silvana by a G.O. agent after numerous operations were conducted against Silvana to make it appear that the Flynn's were

harassing her, such as the incident where she was supposed to be followed by Kevin Flynn. In a similar incident, a very close friend of Silvana's was contacted and given various information with regard to influencing Silvana to fire Attorney Flynn, go to another attorney such as Judd Carhard, and to undertake various actions against Mr. Flynn.

17. In connection with LaVenda Van Schaick, numerous operations, pursuant to the "OPS GOS", were conducted against her, including, but not limited to, the following:

a) LaVenda's auditing files were sent to the BSN G.O. and they were culled for the purposes of obtaining all available confidential and embarrassing information, which was then passed on to various levels within the G.O. Later, when it was learned that Attorney Flynn was aware that the G.O. regularly used auditing files to coerce and attack former members, a program was implemented to make it appear that the information from the auditing files actually came from external forces. In connection with this operation, all the information from the auditing files was used to contact third parties

which the G.O. learned about through the auditing, personnel, ethics, and student files, in order to obtain information from them.

b) LaVenda was tailed actively and her husband, Paul, was tailed as well as her daughter.

c) A phone call was made to LaVenda's employer by a G.O. agent. She was a waitress.

d) When the U.S. G.O. sent the Klingler Mission to Boston in connection with van Schaick, the purpose of which was to separate LaVenda from her attorney, her husband, Paul was followed while Klingler was sent to LaVenda's home, knowing that Paul would not be there.

e) A G.O. agent called the mother of LaVenda's former husband, who was the father of LaVenda's child, Sabrina, for the purpose of having the father bring an action against LaVenda to obtain custody of Sabrina on the grounds that LaVenda was engaged in various activities which were damaging to Sabrina.

f) On another occasion, a G.O. agent followed Sabrina and talked to her while maintaining surveillance on the Van Schaick home.

g) Various calls were made to neighbors of Van Schaick, she was tape recorded in telephone

conversations with David Aden without her knowledge. and various operations were put into effect, all of which were designed to separate LaVenda from Sabrina, from her husband Paul, . . . and from her attorney. The purpose of pursuing these operations was to pressure her and harass her to such an extent that she would be unable to continue with her lawsuit.

18. There was an operation against McLean Hospital, which was associated with Dr. John Gordon Clark, in connection with which a G.O. agent named Cheryl Ballou was planted as an employee of McLean. She subsequently did steal material from that hospital. In another instance, a plant was placed on the cleaning agency of the Center for Destructive Cultism, a center maintained by Dr. Jack Clark. Shortly after I joined the G.O., I learned of an operation, I believe called "Operation Hydra". The purpose of this operation was to steal all books that had negative information against Scientology, from every library in New England. This type of program would commonly go out to all G.O.'s in the United States. In connection with this operation I learned of a false wall that had been erected in the G.O. Boston, behind which were hidden piles of books that had been stolen from various libraries. After the F.B.I. raids,

these books were destroyed. Behind the false wall were many files containing G.O. operations of a highly secretive nature. One G.O. operation involved an effort, after the F.B.I. raid to cover up all of the illegal activities of the Boston G.O. In connection with this operation, Sandy Cooper went all over the United States obtaining affidavits from individuals who had been involved in G.O. operations, which were of a highly confidential and criminal nature. In Boston, Sandy Cooper worked with Julie Bergman in obtaining affidavits from Kathy Brown, Gary Brown, David Grace, Kathy Grace, Peter Marques, Paula Marques, Bill Foster, Nancy Foster, John Craig, Dave Grybowski, and Sharon Grybowski, as well as attempting to obtain affidavits from Robert Dardano and Sue Haffel in connection with the operations, of those individuals, of an illegal nature. I personally saw these affidavits obtained by Sandy Cooper and I know that they were in the possession of the Boston G.O. and the U.S. G.O., and that the contents of such affidavits generally involve the criminal operations that many of these people were involved in, in which they stated that the Church had no involvement and that the operations were conducted by them personally without any responsibility of the Church, all of which of course is a total fabrication. For example, these operations involved the theft of documents from Bingham, Dana & Gould, Dr. Stanley Cath, the

Better Business Bureau, infiltration of the Attorney General's office, and other similar operations. In one operation I gave confidential information about Ron Gollobin, an investigative reporter, to the G.O. which was later telexed up lines in the G.O., for purposes of blocking an investigation by Gollobin, on the Church of Scientology. In connection with this same operation, a girl was employed as a G.O. agent to seduce Michael Talibi, of Channel 5, for purposes of obtaining confidential information and blocking this investigative effort. To my knowledge these operations were successful, and were among the items collected in the aforementioned affidavits. When I last saw the affidavits they were in the possession of Sandy Cooper.

19. In connection with the attempt by the Labowitz family to reach their daughter, Ellen, I personally moved Ellen around to various places in the City of Boston for the purpose of hiding her and separating her from her parents when they were attempting to find her and speak to her about the Church. Other Church officials informed the Labowitzes that they did not know where Ellen was and that they were unable to have her meet with them to discuss her involvement in the Church of Scientology. All of this was a total fabrication because at the same time I was hiding Ellen from

them. Later, as previously stated, the G.O. decided to sue the Flanagan brothers in connection with the parents' attempt to inform her as to what the true nature of Scientology was. Kevin Flynn and Paulette Cooper were targetted in that suit for purposes of pressuring and harassing them, even though the G.O. knew that Kevin Flynn and Paulette Cooper had no involvement in the situation.

20. When I left the G.O., in January, 1982, it had possession of many documents which had been seized by the F.B.I. in the raid of 1977, and which pertained to operations of the Boston G.O. which operations were reflected in documents seized by the F.B.I.

21. There are many operations against numerous individuals that I was involved in during the five years that I was a member of the Boston G.O., which are too numerous for me to remember and recount for purposes of this affidavit.

22. In connection with the G.O. policy to attack an opponent's "position of power", many intelligence gathering operations and programs were instituted against Mr. Flynn to get him disbarred. It was the purpose of the G.O. to file numerous complaints against Mr. Flynn for whatever reasons could be manufactured, inform all of his clients that he

Flynn

was being investigated by the Board of Bar Overseers, attempt to get his clients to request investigation of him and eventually to get him disbarred. This was one of the primary goals of the G.O. throughout a period of about 2 1/2 years, and Attorney Silverglate was constantly pressured to file Complaints against Mr. Flynn, including complaints based on materials stolen from Mr. Flynn's office compound.

23. In connection with the destruction of confidential information damaging to the Church, the G.O. destroyed documents in the Baptista and Garritano files which contained information about problems with the Church, people that Baptista and Garritano had disconnected from, etc. These documents were destroyed after a Court order to produce similar documents in the Troy and Hansen cases.

24. The Church has claimed in its lawsuits that the Fair Game Doctrine was cancelled. This is false. Most of the programs set forth in this Affidavit were conducted pursuant to the Fair Game Doctrine. In fact, the alleged cancellation was only for "PR" purposes, but even the alleged cancellation "does not change any policy with regard to the treatment of S.P.".

Signed under the pains and penalties of perjury
this 7 July 82 day of _____, 1982.

Warren H. Friske
WARREN H. FRISKE

The Church of Scientology of Boston

448 Beacon Street, Boston, Massachusetts 02115 Phone: (617) 266-9500, Telex: 94-0297



Michael Flynn
1 Faneuil Hall Market Place
Boston, Massachusetts 02109

11 September 1979

Dear Mr. Flynn,

This is in response to your letter dated 17/7/79. Upon conclusion of our investigation into the financial aspects of Mrs. Van Schaick's claims, we cannot verify the figures that you have given us but can only document the sum of \$6268.00. To substantiate that figure the following is the breakdown of the monies paid and to what organization:

\$930.00	Church of Scientology of Las Vegas
\$475.00	Flag
\$40.00	American Saint Hill Organization
\$4823.00	Mission of Meadows

Total = \$6268.00

If you can provide documents showing more than the above amount, please forward them to me as a refund will only be paid on those documented payments to the Churches.

The Church is willing to pay the refund unless Mrs. Van Schaick sues the Church, in which case no refund will be paid.

Please be aware of the fact the the Church has documented statements signed by Mrs. Van Schaick regarding her gains and successes in Scientology. The Church also has full documentation of the following which indicates Mrs. Van Schaick's irrational behavior in the past, some of which is prior to any involvement with the Church.

At the age of 15 and 1/2, she attempted suicide.

548

L. RON HUBBARD FOUNDER

Scientology® is an applied religious philosophy. A non-profit organization in the U.S.A. registered in Massachusetts.

She has an extensive drug history including the use of Marijuana, Hashish, Cocaine, Mescaline, LSD, Peyote, Speed and Valium.

She has had three abortions, one in 1973 one in 1974 and one in 1976.

In 1969 and 1970, she had to go to a psychiatrist to handle marital problems. As I'm sure you are aware, she has been married four times.

Mrs. Van Schaick had been expelled by the Church and later signed a statement that she would never cause or take actions to embarrass, sue or harrass the Church of Scientology in any of it's areas - Churches, organizations, Missions, L. Ron Hubbard, Mary Sue Hubbard, now or in the future.

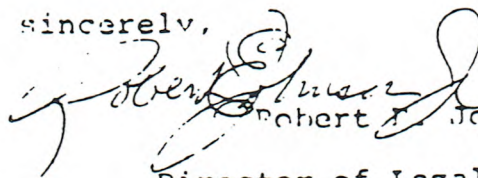
This statement was signed by Mrs. Van Schaick due to her own un-trustworthy state.

This was signed in addition to other contracts and religious covenants which she eventually did breach.

I would appreciate a quick response from you with documentation on any discrepancies of financial data you feel exists.

If there is no response we will assume that your letter of 17/7/79 was written in bad faith and will turn the matter over to our attorneys.

sincerely,


Robert A. Johnson Jr.
Director of Legal Affairs

I. Plant firmly seed of doubt as regards lawyer & husband if possible.

3. Give her education of Cointelpro & what has been done to us.

1. Go thru w/ Melice Towards Same.

2. Go thru THE AMERICAN INQUISITION

3. Go thru - Harassment of Scios

4. mention PTL stuff

4. Asked what happened to her: phone calls, harassing things from unknown people - get across pt. That we didn't do it & willing to testify & that if we didn't then who did & what is their purpose?

5. Get across overt of extortion?

6. offer refund / repayment - we \$800,000 in exchange for docs. Explain AMNESTY and offer it to her - ex. G.O. staff have taken it etc.

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CHRISTOPHER LLOYD)	
GARRISON and ELLEN LEE)	CIVIL ACTION
GARRISON,)	NO. 81-2608-T
)	
Plaintiffs)	
)	
v.)	
)	
JOSEPH FLANAGAN, BARRY)	
FLANAGAN, STEVEN FLANA-)	
GAN, MARK MCGREGOR, ERNEST)	
SIMPSON, JASON VAN STEEM-)	
BURG, JOSEPH THOMAS, KEVIN)	
FLYNN and PAULETTE COOPER,)	
)	
Defendants)	

AFFIDAVIT OF CAROL GARRITY

I, Carol Garrity, being first duly sworn, depose and say:

1. I was a member of the Church of Scientology from April 1975 through July 1980 and during that time I became a staff member and worked full time for the Scientology Organization from August 1976 through July 1980.

2. Between November 1978 and July 1980 I was a member of the "Guardian's Office" of the Church of Scientology. The Guardian's Office, more commonly referred to as the "G.O." by Scientologists, is responsible for intelligence gathering, covert operations and activities, spying

and public relations. The Guardian's Office administers "front" groups such as schools and drug programs which are designed to make money. I have personal knowledge of the foregoing matters and participated in various "operations" conducted by the "G.O."

3. The Guardian's Office headquarters in the United States is in California. However, the Guardian's Office has the power to go into a local Scientology Church and literally take over any section of it or the entire local church if necessary. This is covered in a policy letter written by L. Ron Hubbard, entitled "The Guardian". There is another G.O. headquarters at the Flag Land Base in Clearwater, Florida.

4. The Guardian's Office activities are conducted pursuant to various Scientology policies including "Fair Game Doctrine" which states:

"Fair Game, may be deprived of property or injured by any means by any Scientologist. May be tricked, sued or lied to or destroyed."

5. I have personal knowledge that the Scientology

organization has actively and covertly conducted operations against Attorney Michael Flynn in an attempt to get him disbarred and to destroy him and thereby eliminate him as a representative of those individuals victimized by the Scientology organization. Attorney Flynn was classified as a top "Enemy" of the Church of Scientology and I was sent numerous "orders" to "attack" him in the news media with a "black PR" campaign.

6. One such operation occurred between January and July 1980, when the Guardian's Office conducted a series of covert operations to infiltrate the law office of Michael J. Flynn by placing a "plant" whose code name was "Oscar" and whose real name was William Broderick. I am aware that other "operations" were proceeding against Attorney Flynn to get someone "inside" his office.

7. Prior to July 18, 1980, as an Assistant Guardian, I had numerous conversations with Attorney Steven Burris in Las Vegas, NV, who represents the Church of Scientology there. Conversations related to the intent of the Church to find some basis to bring law suits against Michael Flynn and those in his office and also law suits against LaVenda Van Schaick, Ernest and Dell Hartwell and Eddie Walters. These lawsuits were to be brought against these people pursuant to the policy of the Church of Scientology which states that lawsuits are to be used to harass and attack

people who seek to expose Scientology.

8. In one of my conversations with Attorney Burris in July 1980, he asked me to sign an affidavit in connection with a proposed suit against Van Schaick, the Hartwells and Kevin Flynn. I told him that I could not verify the information in the affidavit. Attorney Burris told me that he was aware of the covert agent used by the Church of Scientology. Attorney Burris asked me if I was "compelled to tell the truth" in the affidavit. I told Attorney Burris that I had always told the truth and he said that he would get someone else for the affidavit.

9. The Guardian's Office devised a covert operation to stop Attorney Flynn's client, LaVenda Van Schaick, from speaking out against the Scientology organization. The program was code named "Shake and Bake" and pursuant to the program, G.O. agents, including Gary Klinger, were sent to Massachusetts to interrogate Ms. Van Schaick and to use various means to have her divorce her husband and fire Attorney Flynn, including the use of her auditing information.

10. The Guardian's Office perused Ms. Van Schaick's

auditing files, which contained the most personal and intimate details of her life, and extracted confidential disclosures for the purpose of using it against her in "Operation Shake and Bake".

11. The practice of reviewing confidential auditing files and extracting private and intimate details of an individual's life is a common Scientology practice. The date gleaned from an unsuspecting individual's file is commonly transmitted to "Flag" in Clearwater, Florida and to the California headquarters for extortion and blackmail. This practice occurs regularly. I have personal knowledge of auditing information being sent to Clearwater and California for this purpose.

12. On one specific occasion, I received a Guardian's Office order concerning Tonja Burden's auditing information. I was sent from the Guardian Office's main headquarters in Los Angeles, a document from Tonja's preclear folder called a "Wants Handled" list. This was a list of things that Tonja wished to improve herself with through auditing. I was also sent a list of "overts" and "withholds" which means transgressions against L. Ron Hubbard, Scientology, etc. The purpose of a person writing their "wrongs" is the general concept of confession. This list is only to be used to help the person face their errors, wrongs, etc. and thereby free the person by having "confessed". These lists are to be held in strict confidence. I was sent a huge stack of Tonja's "overts and withholds" writeups to take to the Review Journal newspaper, along with the auditing list from her preclear folder.

The purpose of the above orders were to disgrace, embarrass, humilitate Tonja and make her lose her credibility with the public and the press, as she had filed a lawsuit against Hubbard and Scientology and according to Scientology policy, anyone who does this an evil person called a "suppressive person" and must be dealt with accordingly. I carried out my orders, however, her auditing information was not printed in the papers, as the news media thought it was a disgusting breach of privacy which it was.

13. When I was first introduced to "auditing" or counselling in the Church of Scientology, I was told that the information or "confessions" I gave to my auditor would be held in strict confidence and that the only persons who had access to my auditing files were the auditor and the "case supervisor" - the person in Scientology who "programmed" the cases and decided what auditing the person should have and buy. This representation is made to anyone who undertakes "auditing" and it is shown to them in writing in the "auditor's code".

14. After I joined staff at the Las Vegas Organization, I had many occasions to witness that many other people within Scientology had access to the auditing files. These people could go to the technical division and take the folders and read them and study them and send information from the folders to other Scientology executives if they were ordered to, or chose to do so. This included information being sent to the Church of Scientology of California in Clearwater, which was regularly done. It was a regular

practice in the Church of Scientology that the Guardian's Office had access to any person's auditing folders at any time the G.O. chose to take them.

15. The Guardian's Offices throughout the United States including Clearwater, Florida are run by the United States Guardian's Office which is part of the Church of Scientology of California. The top executives and management are at the Church of Scientology of California, both in Clearwater, Florida and Los Angeles, California.

16. The routine use and circulation of auditing information is done throughout the United States and outer "missions" send information from a person's auditing folders to the nearest "Class 4 Org" for ethics use or intelligence use in the Guardian Office intelligence files.

17. When "missionnaires" from the Church of Scientology of California would come to Nevada, we were under instructions to give them full back-up and cooperation and this included revealing to them personal information about Scientologists and their auditing folders and intel-

ligence folders, if needed and requested.

18. During executive meetins at the Church of Scientology, on many occasions the executives would sit and discuss information about staff members and public-paying person's auditing information.

19. While on staff in the organization, I was in charge of the division that sold all the auditing and training and books and I was routinely given information from people's auditing folders so that I could get them to buy more and more auditing. This was a standard practice and this information would also be given to "indicate" to the potential buyer what auditing they should buy next, to "cure" whatever "insanity" it was they were trying to get help with.

20. All of the above actions uniformly betray the trust that a person gives to Scientology and their auditor when getting auditing, and this creates a terrible fear about the possiblity of leaving Scientology and having your innermost thoughts, feelings, desires, actions about yourself and others revealed to anyone including your parents, spouse, relatives and the news media.

21. When I thought of leaving Scientology after I realized I had been tricked and lied to, these actions had me terribly fearful that this type of blackmail would be inflicted on me.

22. I left the Church of Scientology on July 18, 1980 after being a staff member for approximately four years. I had become upset and in fear when I learned that the top leaders of Scientology had been convicted of felonies in late 1979 and I did not agree with their conduct of breaking and entering, harassing enemies of the Church, spying on ex-members and other enemies of the Church and trying to infiltrate enemies and all the other unlawful and underhanded conduct conducted by the Church.

23. I had also been told that the alleged crimes top Church leaders had committed were false and that the people were innocent and being framed and suffering from "religious persecution". It was uniformly stated to all Church members that the Church never broke the law and didn't harass critics or enemies.

24. I hired an attorney in Las Vegas, Nevada to represent me and my husband when we left Scientology so that

we would have in writing and on record the exact date we left and also to demand the unused monies on account at the various organizations. My attorney had a letter hand-delivered to the Church of Scientology of Nevada on July 21, 1981 advising them of our intentions and that any attempt to contact us would result in a restraining order as we wanted no contact from any of them.

25. One day later, Maddie Reese, a top Guardian's Office staff member from Los Angeles called Jane Peterson's house, another former G.O. member, asking for me. Jane advised her that I was not taking any calls from any of them and not to call back.

26. I began to receive telephone calls at all hours of the day and night with people either being silent or hanging up.

27. My husband and I then received a new unlisted telephone number and shortly thereafter, the calls began again. Sometimes whoever was calling would ask for a person unknown to me and I would advise them of that and they would call back over and over and ask for the person.

28. My husband and I moved to a house on February 1, 1981 and received a listed number and the calls continued.

29. In mid-March, 1981 I went home to discover my home had been entered, every door in the house opened and my dog had been put outside in the backyard. The sliding glass screen door had been pulled off and was laying across the porch. The police came and could not find a forced entry and a report was not filed.

30. My husband and I filed a complaint against the Church of Scientology, L. Ron Hubbard and Mary Sue Hubbard in federal court in Los Angeles on July 1, 1981.

31. I arrived home after work on my wedding anniversary, July 21, 1981, to find that my home had been broken into and my husband's sports bike had been stolen. Said bike was valued at approximately \$2,000.00. The fingerprint people could find no prints other than one partial footprint in the backyard and that an oily substance had been sprayed on the windows, sliding glass door and door knobs to apparently cover prints. A few days later we discovered my husband's stereo turntable missing and again

found the oily substance.

32. I began receiving phone calls from a girl asking "are your parents there"? I would say she had the wrong number but she would continue to call back. This was very upsetting as I have never recovered from my parents' deaths and this was one of the main things Scientology was supposed to help me with in my auditing (counseling).

Later the same girl started calling and asking for my dad. Finding my father dead and the related circumstances of his illness and his death has always been very hard for me to accept and I revealed this whole situation over and over in my auditing in Scientology.

33. To this day I still receive calls where the person either remains silent or hangs up when I answer. These seem to occur shortly after I arrive home from work, even after I work overtime.

34. On July 28, 1981, exactly one week after the July 21, 1981 breakin, I went home to find my home had been broken into again. This time it was totally ransacked,

drawers dumped, closets gone through and basically a total mess. This time the back bedroom window had been broken out. We could find nothing stolen on this occasion. The same officer who had arrived the other two times came again this time and filed a police report.

35. On September 29, 1981, again I went home to find that my home had been broken into. The side door screen had been ripped out and the window opened and this was the point of entry. This time all my jewelry, wedding rings, keepsakes from my mother and father, my father's keepsakes from the war and college were all stolen. My husband's camera equipment was stolen along with some money and other things. The house had been totally and completely ransacked, every drawer, box, closet in the house dumped on the floor. The back rooms were also ransacked and everything dumped. My briefcase with all of my Scientology papers and correspondence from my attorneys, lawsuit information had been gone through. The fingerprint people found no prints, however, did take pictures of the rooms and the briefcase. I have talked to my neighbors and this is not happening to them. The police have no leads and none of the stolen goods have shown up around town that they know of. The police do not know of another house on our block that has been broken and

entered this many times in this short a time period. The previous owner of the house resided there for approximately twelve (12) years with only one minor occurrence. My husband and I have lost money due to insufficient insurance coverage on the jewelry which we were not aware of and we have had to invest in solid doors, bolt locks and other locks and have ordered iron bars for every window in the house. The last three breakins have all occurred on a Tuesday, starting with our wedding anniversary.

36. Nothing like this ever happened to me before I left Scientology in July 1980.

37. The psychological damage done to me while in Scientology combined with the above harassment, breakins, and strange occurrences have caused great mental stress and upset.

38. My friend, Jane Peterson, who was also a Guardian Office staff member and left Scientology, has received numerous death threats, both oral and written, since she left Scientology and this is very upsetting and frightening to me also.

37. I am aware that many similar operations were conducted against Tonja Burden while I was working for the G.O. I am aware that a G.O. agent, Bill Broderick was placed in a position to spy on Tonja Burden and that the G.O. acquired an apartment in Tonja Burden's apartment building to spy on her and harass her. This is common practice of the G.O. against its enemies.

Signed under the pains and penalties of perjury
this 21st day of May, 1982.

Carol Garrity
Carol Garrity

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 21st DAY OF MAY, 1982.

Carrie B. Stewart
NOTARY PUBLIC



Notary Public - State of Nevada
CLARK COUNTY
Carrie B. Stewart
My Appointment Expires May 23, 1985

OFFICE OF THE BAR COUNSEL
BOARD OF BAR OVERSEERS OF THE SUPREME JUDICIAL COURT
ONE WINTHROP SQUARE
BOSTON, MASSACHUSETTS 02110
(617) 426-8989

BAR COUNSEL

DANIEL KLUBOCK

ASSISTANT BAR COUNSEL

BONNIE H. MACLEOD-GRIFFIN

DERMOT MEAGHER

JAMES S. BOLAN

ELIZA MCCORMICK FELD

INVESTIGATOR

FRANCINE E. MILES

April 2, 1980

PERSONAL AND CONFIDENTIAL

Michael J. Flynn, Esquire
One Faneuil Hall Marketplace
Boston, Massachusetts 02109

RE: BBO File No. B1-80-17

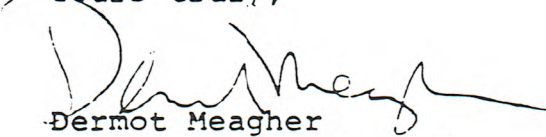
Dear Mr. Flynn:

I have reviewed the matters brought to our attention by Robert E. Johnson, Jr., and have recommended that these matters be closed in this office.

This matter is closed and has not been docketed by this office as a Complaint within the provisions of Supreme Judicial Court Rule 4:01 and the regulations of the Board of Bar Overseers adopted thereunder.

Thank you for your attention in this matter.

Yours truly,


Dermot Meagher
Assistant Bar Counsel

DM/cc

OFFICE OF THE BAR COUNSEL
BOARD OF BAR OVERSEERS OF THE SUPREME JUDICIAL COURT
ONE WINTHROP SQUARE
BOSTON, MASSACHUSETTS 02110
(617) 426-8989

BAR COUNSEL

DANIEL KLUBOCK

ASSISTANT BAR COUNSEL

BONNIE H. MACLEOD-GRIFFIN

DERMOT MEAGHER

JAMES S. BOLAN

ELIZA MCCORMICK FELD

April 10, 1980

INVESTIGATOR

FRANCINE E. MILES

Robert E. Johnson, Jr.
The Church of Scientology
448 Beacon Street
Boston, Massachusetts 02115

RE: BBO File No. B1-80-17 (Michael J. Flynn, Esquire)

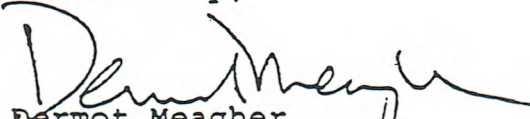
Dear Mr. Johnson:

I am in receipt of your hand-delivered letter dated April 3, 1980. It appears that you had not yet received my letter of April 2, 1980 at the time you sent us your letter.

I am enclosing another copy of that letter. I have reviewed your letter dated April 3, 1980 and have determined that the matter will not be reopened.

I regret that we cannot be of assistance to you.

Yours truly,


Dermot Meagher
Assistant Bar Counsel

DM/can.
Enclosure
bcc Michael J. Flynn, Esquire

OFFICE OF THE BAR COUNSEL
BOARD OF BAR OVERSEERS OF THE SUPREME JUDICIAL COURT
ELEVEN BEACON STREET
BOSTON, MASSACHUSETTS 02108
(617) 720 0700

BAR COUNSEL

DANIEL KLUHOCK

ASSISTANT BAR COUNSEL

BONNIE H. MACLEOD-GRIFFIN

DERMOT MEAGHER

JAMES S. BOLAN

ELIZA MCCORMICK FELD

CONSTANCE V. VECCHIONE

PAUL A. A. ST. AMOUR

INVESTIGATORS

May 4, 1981

JAMES J. O'NEILL

FRANCINE E. MILES

Rev. Robert E. Johnson, Jr.
The Church of Scientology of Boston
448 Beacon Street
Boston, Massachusetts 02115

Re: BBO File No. B1-81-3V

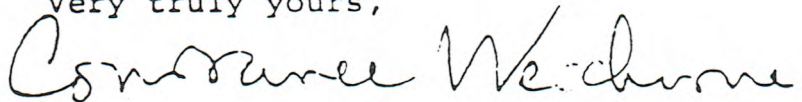
Dear Reverend Johnson:

I have reviewed and investigated the matter which you brought to our attention regarding Attorneys Flynn, Greene and Hoffman.

Please be informed that after due consideration of this matter, the file has been closed in this office as not involving professional misconduct warranting disciplinary action by the Board of Bar Overseers.

I am sorry that we cannot be of assistance to you.

Very truly yours,



Constance V. Vecchione
Assistant Bar Counsel

CVV/ch

cc: Michael J. Flynn, Esq.
Thomas M. Greene, Esq.
Thomas G. Hoffman, Esq.

HALE AND DORR
COUNSELLORS AT LAW
60 STATE STREET
BOSTON, MASSACHUSETTS 02109

TELEX
94-0472

TELECOPIER
DOMESTIC (617) 367-6133 (617) 742-9106
INTERNATIONAL (617) 367-6180

TELEPHONE
(617) 742-9100
CABLE ADDRESS
HAFIS BSN

March 3, 1980

Michael J. Flynn, Esq.
3 Faneuil Hall Marketplace
Boston, Massachusetts 02109

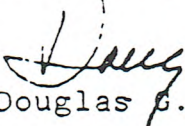
Dear Mike:

You asked me to write a letter reporting a conversation which I had with an individual who made an inquiry about you.

About a month ago an individual called me on the telephone, stated his name was Eric White and that he was a paralegal employed by a New York firm, whose name he mentioned but which I forget. He said he was calling concerning the Sequeira case because his firm in New York had a case very similar to it. He asked a few questions about whether Mr. Sequeira was alive or whether the wife was still around and I said I had no idea. He then started asking some questions about you. He asked if I thought you handled the case well and I said I thought you did. He asked if there was any unethical conduct of yours in the case and as to whether there were any bar association complaints pending. I told him certainly not and at that point I asked him if he was sure that he in fact was a paralegal as he had represented to be and I told him that I thought his questions at that point were quite ridiculous. He repeated that he was and he indicated that he was calling from a pay phone and the conversation ended.

That is all I can remember of it. It certainly did appear to me that when he made some statements implying improper conduct on your behalf he was not who he represented himself to be. Unfortunately I made no notes or other memoranda of the conversation.

Very truly yours,


Douglas G. Moxham

MATTHEW BROWN
ALFORD P. RUONICK
HIRSH FREED
HENRY GESMER
EDWARD SCHNEIDER
AARON J. BRONSTEIN
MARVIN N. GELLER
JACK M. CALECHMAN
DONALD E. PAULSON
KENNETH A. KORB
PETER D. GENS
LAWRENCE M. LEVY
STEPHEN WOLFBURG
PHILIP C. SCHNEIDER
M. FREDERICK PRITZKER
JOEL M. RECK
ANDRÉ C. JASSE, JR.
JEFFREY M. FREEDMAN
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JOHN F. COLLINS

February 1, 1980

Michael Flynn, Esquire
One Faneuil Hall Market Place
Boston, Massachusetts 02109

Dear Mike:

As we discussed on the telephone the other day, this will confirm that I received telephone calls from someone claiming to be Eric White who alleged that he was writing an article concerning medical malpractice cases and requested information concerning you, and my professional opinion of you as an attorney.

I indicated to Mr. White that I was reluctant to divulge any information concerning a person's character over the telephone, even if that information would be complimentary to the person.

However, Mr. White was insistent and proceeded to ask questions about major litigation that you were involved in since the time you passed the Bar, in fields other than medical malpractice. Indeed, the caller proceeded to ask questions about your personality during law school and your background before law school.

Since I did not recall any specific incidents during law school, I was very general in my responses, despite the caller's insistence on specific information.

If I can be of any further help, please do not hesitate to contact me.

Best personal regards.

Sincerely,

Sheldon M. Drucker

M E M O R A N D U M

FROM: Tom Holman
TO: Files
DATE: August 26, 1981

RE: Peggy Bear v. Church of Scientology

On August 20, 1981, I had a telephone conversation with Sanford Katz, Esq., attorney for the Church of Scientology, New York. Mr. Katz called to say that the Church would only settle for the amount paid in by Donald and Peggy Bear, which totals approximately \$104,000.00 and that the Church would not pay an additional \$10,000.00. After repeated questions as to whether the Church had ever agreed to pay \$10,000.00 on top of the amount paid in, Mr. Katz admitted that it once had made that agreement but that Mr. Flynn had rejected the offer.

Mr. Katz again, as in previous telephone conferences, repeated the taunt that we should personally ascertain whether Donald and Peggy Bear were agreeing to settle since Mr. Flynn could not be trusted.

Mr. Katz stated that "I am looking forward to Mr. Flynn's disbarment." I asked him to repeat that statement and after he did, I repeated it and asked him if that was an exact quotation. He stated that it was. I said to him that that was a hell of one thing for one lawyer to say to another lawyer since it is slanderous. I asked him for the underlying facts and after repeated requests for the facts that he had relating to any claim that he had that Michael Flynn had acted unprofessionally, all he could say was that it was the way that Mr. Flynn had been conducting the settlement negotiations nationwide. Katz asserted that the Bear's settlement was Flynn's way of cashing in and spreading out his losses. I asked him whether he, on behalf of the Church, had or was prepared to file any complaint with the Bar Association. Mr. Katz said he had not filed such a complaint.

I stated to Mr. Katz that I had an obligation to inform Mr. Flynn of his statements and he said "go right ahead."

Subsequently, I telephoned Michael Flynn and informed him of the substance of the above conversation with Sanford Katz, Esq.

TAH/jdw

VICTIM'S COPY

Boston Police INCIDENT REPORT

01 KEY SITUATIONS WILE COMMUNITY DISORDERS DRUGS EXCISED PREMISES FLEETLY		02 MEETING TIME		03 MEETING TIME		04 MEETING TIME	
05 COMPLAINT NO		06 NATURE OF COMPLAINT		07 CRIME CODE		08 STATUS ARRESTED UNDER 18B EXCEPTED UNDER 18B	
09 LOCATION OF INCIDENT # STREET		10 INTERSECTION ALPHA CHIEF #		11 DISPATCH TIME		12 TIME OF OCCUR	
13 VICTIM/COMP (LAST FIRST MI)		14 PHONE		15 SEX		16 RACE	
17 ADDRESS # STREET CITY AND STATE IF OTHER THAN HOST (W/IN MASS)		18 APT		19 AGE		20 DOB	
21 PERSON REPORTING (IF DIFFERENT THAN ABOVE)		22 ADDRESS		23 APT		24 PHONE	
25 WAS THERE A WITNESS TO THE CRIME?							
26 NUMBER OF PERPETRATORS							
27 CAN SUSPECT BE IDENTIFIED AT THIS TIME?							
28 CAN SUSPECT VEHICLE BE DESCRIBED?							
29 STOLEN ABAND USED IN CRIME		30 RECOV IN CUST OTHER		31 REG STATE		32 NO	
33 VEHICLE MAKE/YEAR		34 MODEL		35 PLATE TYPE		36 YEAR (EXP)	
37 OPERATOR'S NAME		38 LICENSE NO		39 OPERATOR'S ADDRESS		40 VEHICLE ID NO	
41 OWNER'S NAME		42 OWNER'S ADDRESS		43 STYLE		44 COLOR (TOP/BOTTOM)	
45 CAN PROPERTY BE IDENTIFIED?							
46 TYPE OF PROPERTY		47 SERIAL OR IDENTIFICATION NO		48 BRAND NAME/DESCRIPTION		49 MODEL	
50 VALUE		51 UIN CLASS		52 RECOV		53	
54 IS THERE A SIGNIFICANT M.O.?							
55 TYPE OF WEAPON/TOOL		56 NEIGHBORHOOD		57 TYPE OF BUILDING		58 PLACE OF ENTRY	
59 WEATHER		60 LIGHTING		61 TRANSPORTATION OF SUSPECT (CAR, FOOT, MBTA, ETC)		62 VICTIM'S ACTIVITY	
63 UNUSUAL ACTIONS AND STATEMENTS OF PERPETRATOR				64 RELATIONSHIP TO VICTIM			
65 IS THERE ANY PHYSICAL EVIDENCE? (DESCRIPTION AND DISPOSITION IN NARRATIVE)							

YES NO

YES NO

YES NO

YES NO

YES NO

YES NO

YES NO

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

No. 79-2491-G

-----X
LaVENDA VANSCHAICK, ET AL, :
 :
 Plaintiffs, :
 :
 VS. :
 :
 CHURCH OF SCIENTOLOGY OF :
 CALIFORNIA, ET AL, :
 :
 Defendants. :
-----X

DEPOSITION of KEVIN TIGHE, a witness
herein, taken pursuant to the applicable provisions of the
Federal Rules of Civil Procedure, at the offices of Michael J.
Flynn, Esquire, 12 Union Wharf, Boston, Massachusetts 02109,
on Monday, December 20, 1982, commencing at 10:15 a.m., before
Karen E. Rizman, a Notary Public within and for the Commonwealth
of Massachusetts.

RIZMAN COURT REPORTING
18 TREMONT STREET
BOSTON, MASSACHUSETTS 02108
(617) 227-1688

1 A I don't know who she worked for; for the Church of
2 Scientology.

3 Q Of California?

4 A I imagine; but that's my guess.

5 Q And at the time, you were working for the Church of
6 Scientology of Boston, right?

7 A Right.

8 Q And you were being briefed by the Church of Scientology of
9 California out in Los Angeles?

10 A I was loaned to the Church of Scientology, California, by
11 Boston.

12 Q Okay. That's two times.

13 What other -- for what other purposes did you go to
14 Los Angeles?

15 A That's actually three times. There's twice in December
16 for the legal case, once flying out to be briefed, once
17 when we ended it for December and flew back out and came
18 back, once bringing the trash documents out.

19 I don't really recall, to tell you the truth.

20 Q Well, you remember going out there often in 1981, as many
21 as 15 times?

22 A Yeah, I went out once as -- once, twice in one week, and
23 I believe once was a discussion with regard to what to do
24 with the trash documents, just discussion. And the second

1 time that week was actually, physically, bringing them out.

2 Again, they were probably mostly briefings. In
3 other words, instead of speaking to somebody on a phone or
4 something about strategy or where we want to proceed, we'd
5 be flown out for a weekend and have meetings and develop
6 strategy.

7 Q Okay. Who flew you out?

8 A Boston would always pay for it, as far as I know.

9 Q Did you ever see the checks?

10 A No, because for the most part, they were paid for at the
11 airport, but I'm almost sure -- I mean, that would be easy
12 to find out, I suppose, if Boston would pay for it.

13 Q How do you know?

14 A Because I'd have to get with the finance person in Boston
15 to make sure that the reservation was made, and find out
16 what the cheapest flight or the best available flight was.

17 Q But you don't know where the finance officer was getting
18 his approval for the flight, do you?

19 A No, don't know.

20 Q Can you remember any other reason you went to Los Angeles
21 in 1981, other than what you've testified to?

22 A I think what I testified to pretty much covers it.

23 Q All right.

24 Now, you took some documents from this office

1 compound; is that correct?

2 A Yes. Trash, like you were about to say.

3 Go ahead.

4 Q Well, the question is: Did you take some documents from
5 this office compound?

6 A If you can define that?

7 Q "Office compound" means anywhere, any location inside the
8 gates that front on the public highway.

9 A Well, for the most part, with regard to the action you're
10 talking about, there were no gates.

11 Q All right. Anywhere inside the line that runs along - and
12 we'll get some pictures at the break --

13 A No, that's fine.

14 Go ahead.

15 Q -- that runs -- you know where the Granite Building, the
16 face of the Granite Building, is; out front, Union Wharf?

17 A Well, there's a dumpster in the back there, okay?

18 Q All right.

19 A Fine.

20 Q Do you know where the face of the Granite Building is,
21 along the sidewalk?

22 A Sure.

23 Q All right.

24 And then there's a parking area behind that Granite

1 Building; is that right?

2 A Right. That's correct.

3 Q Now, you've walked into that parking area; is that correct?

4 A Sure.

5 Q When you walked into that parking area - just yes or no -
6 did you know whether or not it was private property or not?

7 A Did I know whether or not it was private property or not?

8 No, I didn't know whether it was private property or not.

9 Q You didn't know?

10 A That's correct.

11 Q Okay.

12 Did you know whether there was a security guard?

13 A Sure. I often talked to him, had cigarettes with him,
14 spoke to him about what I was doing.

15 Q Okay. Your testimony is that you had conversations with
16 the security guard --

17 A Several.

18 Q -- at Union Wharf?

19 A Several.

20 Q All right.

21 Does "several" mean two or more than two?

22 A Over whatever period, a two-and-a-half-year period of time,
23 between here and back at Faneuil Hall, I probably spoke to
24 them 20. 30 maybe even 40 times.

1 Q All right. We're going to forget Faneuil Hall.

2 A Good. 20 times is a good ballpark figure.

3 Q 20 times you had conversations with the security guard at
4 Union Wharf; is that correct?

5 A Yes. More than one; there were probably two or three
6 security guards.

7 Q All right.

8 Now, generally, what time of the day did you have
9 those conversations?

10 A It was either in the evening, very late - eleven, twelve
11 o'clock at night - or very early in the morning - 5:30,
12 six in the morning.

13 Q And what was the substance of those conversations, as best
14 you can recall?

15 A "Hi, how ya doing? It's cold out. Got a light?" Nothing,
16 you know, "Hey, can you come in the morning, because
17 people don't want you coming here at night?" That was one
18 conversation. "Please come in the morning."

19 Q Did the security guard give you permission to come onto
20 the property?

21 A Sure. As a matter of fact, a guy named Warren, who was the
22 overall supervisor here, about the first week that you
23 moved into this complex, accompanied me around, letting me
24 take trash.

1 Q What is his name?

2 A Warrren.

3 Q Do you remember his last name?

4 A No.

5 But he was the superintendent, or person in charge
6 of the crews, and he let me -- he actually let me come
7 into the building, take a barrel, and walk around with it.

8 Q Come into what building?

9 A Come into the complex, I'm sorry -- Oh, no, into the
10 building, the middle building over here, where the -- it's
11 residential and offices, and let me use the barrel that he
12 pushed around, putting trash into. He gave me permission.

13 Q He let you use his barrel?

14 A Pushcart. And let me walk around freely.

15 Q So you walked around with his barrel --

16 A Freely. He let me do it.

17 Q -- in the gray building?

18 A In the gray building, around the complex, wherever I
19 wanted to go, he said, "No problem."

20 Q Well, let's -- you were in the gray building with the
21 pushcart?

22 A Yes. That's where they store it.

23 Q And you walked around the gray building, retrieving trash?

24 A Inside the gray building, around the complex here, out by

1 the dumpster.

2 Q And where did you retrieve trash inside the gray building?

3 A There's - on each floor - receptacles where the people put
4 their trash, so they don't have to bring it out to the
5 dumpster, and he accompanied me.

6 Q And you took all those people's trash?

7 A No. I helped him. I didn't take it. I helped him bring
8 it outside.

9 Q Who did you tell him you were?

10 A I used an undercover disguise, saying that I was an artist,
11 and I needed -- could use the materials to help me with my
12 artwork.

13 Q Where did you learn that disguise?

14 A Where did I learn it?

15 Q Right.

16 A I thought it up myself.

17 Q Did you have any discussions with anybody about it?

18 A No. It was kind of off-the-cuff.

19 Q Did you have any discussions with Elaine Segal or Maureen
20 Nagles about it?

21 A Neither.

22 Q Robert Johnson?

23 A No.

24 Q Warren Friske?

1 A I didn't discuss it with him, no.

2 Q Okay.

3 So you just thought up this ruse, that you were an
4 artist looking for --

5 A Well, the fact of the matter is, there's a book published
6 on the subject, which is available in any library, in
7 which I believe there's legal precedents saying that it's
8 okay to do, which you --

9 Q Who told you about that book?

10 A Somebody -- I don't know. Somebody brought it to my
11 attention. I'm not even sure. It was --

12 Q And what is your --

13 A Anyway -- let me finish my answer.

14 Q Oh, go ahead.

15 A Good.

16 And, based on that book, it was done. As far as
17 using the guise of an artist, it was an off-the-cuff thing
18 the first time I needed to think something up. There was
19 even a -- it was even recorded -- there was even a subject
20 of the same type of investigative technique in The Real
21 Paper approximately two years ago, before it went down the
22 drain.

23 Q So you read it in The Real Paper, too?

24 A After I had begun. There's an investigator down in Quincy

1 that uses the technique.

2 Q Do you recall the name of the book?

3 A No, but the guy was the -- he became famous for taking the
4 trash of Henry Kissinger and various other celebrities and
5 then making them into sculptures.

6 Q Where did you learn about the book?

7 A I don't recall. Again, it was mentioned to me at some
8 point and I don't recall.

9 Q What is your memory of what the book says with regard to
10 the legal precedents about the permissibility of taking
11 the trash?

12 A Didn't read the book; just glanced through it, saw that he
13 had went, I think, all the way up to the Supreme Court and
14 gotten a decision in his favor, I believe, against Henry
15 Kissinger.

16 Q So it's your testimony that you glanced through a book --

17 A Yes.

18 Q -- that said it was legally permissible to go and take
19 people's trash?

20 A No, that's not my testimony.

21 Q Well, did you testify that you were --

22 A My testimony is that I saw a book, glanced through it, and
23 in that book there's some type of legal precedent with
24 regard to this individual. As far as what the precedent is,

1 I don't know.

2 Q Did you consult any attorneys as to whether it was legally
3 permissible?

4 A No.

5 Q Did you question whether or not the trash could be taken
6 from public or private property?

7 A Not initially, no.

8 Q Did you question that at some point?

9 A At some point, we researched the laws and found out, except
10 for an ordinance that might - if you got real general
11 about it - might apply with regard to being a junk collec-
12 tor. That's the only --

13 Q Who researched the law, Mr. Tighe?

14 A Ben Shaw, I believe.

15 Q Who's Mr. Shaw?

16 A Ben Shaw assisted -- was the Assistant Guardian for Infor-
17 mation for approximately one year.

18 Q And when did you research the law?

19 A I didn't research the law.

20 Q When did Mr. Shaw research the law?

21 A I don't know, but he was -- it would have probably been in,
22 maybe, fall of '81. I really don't know.

23 Q In the fall of '81. Is that when you --

24 A Summer of '81. I don't --

1 Q Was that the time that you stood up in front of Judge
2 Garrity?

3 A No, it was before that.

4 Q What's your best memory as to how long before that?

5 A I'd say, maybe six to nine months prior to that.

6 Q Okay.

7 How long had you been taking the trash when you
8 were told by Mr. Shaw that he had been researching the
9 subject? How long had you been taking the trash before
10 that?

11 A We began taking the trash here, or --

12 Q Just let's deal with Union Wharf. When did you begin
13 taking the trash here?

14 A Approximately a week after you moved here, and I believe
15 you moved here in the summer of '80, maybe the spring of
16 '80, I don't -- I think it was the spring of '80.

17 Q If I suggest to you it was February of 1980, does that
18 refresh your memory at all?

19 A Could have very easily been, sure.

20 Q All right.

21 So you took the trash from here between February of
22 '80 and sometime six to nine months before the fall of
23 '81 --

24 A You've got me confused.

1 Q Before Mr. Shaw told you --

2 A I'm not even with you. If you're asking me a question,
3 start again.

4 Q All right, let's start over again.

5 What's your best memory of how long you took the
6 trash from Union Wharf before Mr. Shaw told you that he
7 had researched the taking of trash between -- from public
8 or private property?

9 A Again, you're going to have to get your questions so I can
10 understand them.

11 Q All right.

12 At some point in the early part of 1980, you were
13 taking trash from Union Wharf; is that correct?

14 A Early part of 1980? Yes.

15 Q All right.

16 And at some point, Mr. Shaw told you that he was
17 researching the laws about taking trash from public or
18 private property; is that correct?

19 A That's correct.

20 Q All right.

21 And your best memory of when Mr. Shaw did that is
22 six to nine months before the fall of '81; is that correct?

23 A That's correct.

24 Q So that would put it roughly in the time of, say, anywhere

1 between February and May, 1981, that Mr. Shaw told you
2 that he was researching the law on that subject?

3 A Right.

4 Q So at that point, you had been taking the trash for
5 roughly a year from Union Wharf; is that correct?

6 A Right.

7 Q Now, during that year, did you research the law or make
8 any attempt to find out whether it was legally permissible
9 to go onto private property and take trash?

10 A No.

11 Q All right. Now, as I understand your testimony, you had
12 approximately 20 conversations with security guards at
13 Union Wharf, where they told you that you could do it.

14 A No. I had 20 conversations with security guards. There
15 were a couple -- they never said I couldn't do it. The
16 conversations were usually more along the line, "Hi, how
17 you doing tonight? Gee, it's cold out, it's snowing."
18 "It's hot." "You got a cigarette?" "You got a light?"
19 You know. "It's late, I'm tired."

20 Q Where did you have those conversations in the normal
21 course?

22 A Usually in the parking lot, because they made rounds,
23 usually in the parking lot there, right by the dumpster;
24 occasionally, by the enclosed area there. Would say "Hi"

1 to them, go -- walk by. "Hi, how you doing? Going over
2 to the dumpster now."

3 Q Now, on how many occasions did they give you permission to
4 take the trash?

5 A I wouldn't say that there was a time when they said, "You
6 now have permission," with the exception of Warren, origi-
7 nally, when I first --

8 Q What did Warren tell you?

9 A Warren said, "Sure, you can have the trash. I don't care.
10 It doesn't bother me." "Can I use the barrel?" "Sure."
11 You know. "Let me show you around."

12 Q All right. Now, you used the barrel for what?

13 A Initially, to put the garbage into the barrel, and then
14 bring it back to the dumpster, through various areas.

15 Q Okay. You'd come into the Granite Building and get the
16 barrel --

17 A Just once or twice, because subsequently it was found out
18 that trash was put directly into the dumpster. We didn't
19 know where the trash was. I didn't know where the trash
20 was at that time.

21 Q Well, what were you using the barrel for?

22 A Again, I didn't know where -- if the trash -- whether you
23 threw the trash right outside your door there, whether it
24 was brought back to the dumpster. There are various

1 buildings here where the trash is left right outside. At
2 least, at that time I saw that. And so the barrel would
3 have been used to throw your trash into the barrel and
4 brought back to the dumpster. As it turned out, it was --
5 kind enough as to bring the trash directly back there for
6 us.

7 Q So you used this barrel to go around and pick up the trash
8 and bring it to the dumpster?

9 A I used the barrel? I, with the permission of Warren -- at
10 some point, I went around with Warren; at other times he
11 let me do it by myself. I think the first time, he might
12 have walked around with me -- in all did maybe two times.

13 Q Now, you were interested in getting the trash from my
14 office; is that right?

15 A That's correct.

16 Q All right.

17 Did you walk around Union Wharf with Warren and
18 collect trash from other offices and bring it to the
19 dumpster?

20 A Only so that -- yes, to answer your question.

21 Q For what reason?

22 A So that I wouldn't go directly to your office, take your
23 trash. It would kind of stick out a little.

24 Q You did it as a cover?

1 A Right.

2 Q In connection with your cover that you were an artist
3 looking for --

4 A That's correct.

5 Q Okay.

6 And at any point in time, did Warren tell you not
7 to do it?

8 A No.

9 Q Do you know how long Warren was here?

10 A No idea. I saw him the first few days, when he gave me
11 permission to do it, and the permission was pretty much no
12 problem with me. He was the one in charge of that, and he
13 didn't have any problem on it.

14 Q All right.

15 And did any other guard ever give you permission?

16 A One guard told me not to come at night, but it was okay to
17 come in the morning, because it disturbed people in the
18 evening. They might think it was a burglar or something.

19 Q And when did the guard tell you that?

20 A Geez, I have, really, no recollection of when it was,
21 except it wasn't during the cold season. It would have
22 been during the summer.

23 Q Was it a night -- was it '80 or '81?

24 A Oh, it was -- I don't know if it was '80 or '81.

1 Q So did you come in the morning?

2 A Yeah. We started coming in the morning, sure.

3 Q Did you ever come at night after that?

4 A Very possible. I don't know. I'm sure we did change it
5 later on. We might have started coming at night again.

6 Q Did you ever wear a beeper?

7 A At one time, I was -- I had a job. Yes.

8 If you want to know why, it's no big deal to me.

9 Q The answer is you wore a beeper: is that right?

10 A Yes.

11 Q All right.

12 Did you ever come here with anyone else?

13 A Sure.

14 Q And who else did you come here with?

15 A I came here with Warren Friske, Chuck Malone, Paul Ladoo,
16 Ed Lobel. I think that covers it.

17 Q And did those people -- in the normal course, did you come
18 with another person?

19 A In the normal course, no.

20 Q In the normal course, you came alone?

21 A For the most part, yeah.

22 Q Did you ever come where any of those individuals you men-
23 tioned or any other person was posted as a lookout?

24 A As a lookout. I don't recall, no.

1 Q You don't recall any of them being posted as a lookout.

2 Do you recall having any conversation with any of
3 those people about using your beeper so that they could
4 notify you if a guard was coming there?

5 A No.

6 Q Never had such a conversation?

7 A No. If you want to elaborate on the beeper issue, I'd be
8 more than glad to.

9 Q Well, Mr. Tighe --

10 A If you're interested in the facts.

11 Q -- have you ever heard of a policy called "TRL"?

12 A No.

13 Q Have you ever seen a policy called "TRL"?

14 A No idea. Never seen a policy; don't know what it is.

15 Q Have you ever received any training for lying under oath?

16 A Lying under oath? No.

17 Q How to outflow false data effectively? Have you ever heard
18 that policy?

19 A No.

20 Q Do you know whether that's any part of Guardian's Office
21 training?

22 A No. I know it's not.

23 Q How do you know it's not?

24 A Because I've never been trained on it, and I've never seen

1 any training like that.

2 Q So that's your -- the scope of your knowledge, or
3 extent of your knowledge, as to why it's not a poli
4 because you were not trained on it?

5 A Right.

6 Q Did anyone ever tell you it was not a policy?

7 A No. It's the first I've heard about it.

8 Q All right.

9 Let's get back to the trash. Your testimony, ju
10 so we're clear, is that none of those other people that
11 you mentioned, or any other person, was ever posted as a
12 lookout?

13 A Not to my recollection, posted as a lookout, no.

14 Q All right.

15 Did you ever come and retrieve the trash between
16 twelve midnight and six a.m.?

17 A I'm sure we came during those times, sure.

18 Q How often would you say you came during those hours?

19 A Well, quite often it would be just past twelve midnight,
20 so it could be, like, 70% of the time, could be, and quite
21 often it was before six. Those are actually the better
22 times, past twelve, before six. So almost all the time
23 during those hours.

24 Q It was past twelve o'clock.

- 1 A For the most part.
- 2 Q Why did you choose past twelve o'clock, Mr. Tighe?
- 3 A Well, for obvious reasons; there's less people around.
- 4 Q Why did you want less people around?
- 5 A Well, because it's something that is out of the ordinary.
- 6 In other words, if there was a lot of traffic coming
- 7 through the parking lot, people might complain about it.
- 8 Q You didn't want people to know about it?
- 9 A They could know about it all they wanted, as far as I was
- 10 concerned. It's whether we would be asked to stop doing
- 11 it, so we avoided confrontations with people so that we
- 12 weren't bothering anybody.
- 13 Q That's why you used the cover story --
- 14 A Yeah. Well, I didn't want --
- 15 Q -- so you could keep doing it?
- 16 A -- to go around saying I was taking Mike Flynn's trash,
- 17 because it might get back to you.
- 18 Q Why didn't you want it to get back to me?
- 19 A Because we wanted to continue the intelligence activity.
- 20 Q Now, did you know I was an attorney when you were doing
- 21 that?
- 22 A Yes.
- 23 Q And who suggested that you do it?
- 24 A I don't recall it specifically being suggested. It's --

1 again, it's an investigative technique that isn't uncommon

2 Q Did you get authorization from anyone to do it?

3 A No, I think it was more -- no, I don't recall getting
4 authorization. It's not the kind of thing you specifically
5 had to get authorization for, I wouldn't say.

6 Q It's not?

7 A No. It's information collection. I mean, it could be
8 going to the library.

9 Q All right. It's your testimony that, under G.O. policy,
10 it was not the type of thing that you needed authorization
11 for; is that your testimony?

12 A I never needed it, no. No.

13 Q Did you ever get approval for it?

14 A Approval?

15 Q Right.

16 A I don't know exactly what you mean.

17 Q Did anyone ever tell you to do it?

18 A I don't specifically recall; I believe, at that time -
19 when we first originally started it - Gary Lawrence was in
20 Boston, and it was a suggestion; it was something, you
21 know, a means of obtaining information, investigative
22 technique.

23 Q Gary Lawrence told you about it?

24 A I believe it was -- it could have been at his suggestion,

1 sure.

2 Q Do you know what his post was?

3 A Don't know what his post was, no.

4 Q Do you know whether he was in the U.S.G.O.?

5 A Yeah, he was in the U.S.G.O.

6 Q And he came to Boston and spoke to you about it; is that
7 right?

8 A Among other things, yeah.

9 Q What else did he speak to you about?

10 A I think -- no court checks had been done on yourself and
11 the other attorneys, checking courts - basic information
12 collection - got those wrong, I believe. We went through
13 all the docket sheets in the various Counties to see what
14 type of cases, what type of lawyer you were, what, you
15 know, what kind of cases you tried.

16 Q When did you have this conversation with Mr. Lawrence?

17 A Would have been December of '79, maybe November of '79.

18 Q And the U.S.G.O. is the Church of Scientology, California;
19 is that right?

20 A I believe that U.S.G.O. is part of it. I'm not sure. I
21 believe it is.

22 Q All right.

23 And your best memory is it was Mr. Lawrence that
24 suggested that's what you should do?

1 A I believe so.

2 Q And did anyone accompany Mr. Lawrence?

3 A No.

4 Q And did he show you any mission orders?

5 A Yes.

6 Q What did he show you?

7 A Mission orders.

8 Q What did they say?

9 A They, again, would have covered things like, "Get a
10 liaison in with Legal; find out what's going on with the
11 cases; do court checks on the people involved," meaning
12 go through civil cases, see if they're involved in any
13 civil cases. We ran through docket sheets, again, to try
14 to get a feel for what kind of lawyer you were, what kind
15 of cases you had tried. Check newspapers; basic, again,
16 investigative techniques.

17 Q Did the mission order have on it the trash retrieval?

18 A I believe it may have said, "Check out the possibility
19 of" -- you know, of obtaining it, sure. Probably where it
20 came from.

21 Q And did the mission orders have anything on there about
22 putting a plant inside my office?

23 A No.

24 Q You're sure about that?

1 A It's strictly off-limits.

2 Q Do you know where Mr. Lawrence is today?

3 A No idea. I'd say he's in California, but I --

4 Q Do you know whether he's in the Church or outside the
5 Church?

6 A I don't believe he is on staff?

7 Q Do you know Mr. Kloppe?

8 A Yes.

9 Q Did you have any dealings with Mr. Kloppe?

10 A Wait a minute.

11 Q Paul Kloppe?

12 A No. No, I was thinking of somebody else. No, I don't
13 know who he is.

14 Q All right.

15 Now, you mentioned a fellow by the name of Chuck
16 Malone?

17 A Yes.

18 Q Did you know Mr. Malone?

19 A Sure.

20 Q And do you know whether or not Mr. Malone tried to pose as
21 a private investigator?

22 A He wasn't posing; he was a private investigator.

23 Q And do you know whether he came to me, offering his
24 services to me, as a private investigator, working for me?

1 A I don't know if he came to you or you came to him. I know
2 that there were conversations between the two of you. How
3 it came about, I don't know.

4 Q And do you know whether or not he tried to enter into my
5 employ as a private investigator while he was actually an
6 undercover investigator for the Church?

7 A I don't know.

8 Q Do you know anything about that?

9 A I know that conversations took place -- or a conversation
10 took place between you two.

11 Q How do you know that?

12 A Because he told me.

13 Q What did he tell you?

14 A That he had spoken to you.

15 Q About what?

16 A Just that -- I don't actually know; don't know.

17 Q Do you know whether or not he had any mission orders to do
18 that?

19 A No, I don't know.

20 Q All right.

21 Did you ever have any conversations with Silvana.
22 Garretano, Mr. Tighe?

23 A Yes.

24 Q When?

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

LA VENDA VAN
Schnick, et al

Plaintiffs

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al,

Defendants

CIVIL ACTION
NO. 79-2491-G

AFFIDAVIT OF WARREN H. FRISKE

I, Warren H. Friske, hereby depose and state
as follows under the pains and penalties of perjury:

1. I have personal knowledge of the facts set
forth in this affidavit and if called upon to testify in
Court, could do so of my own personal knowledge.

2. I am 34 years old and reside in Lynn, Massa-
chusetts.

3. Between the years 1972 and 1982, I was a member of the Church of Scientology of Boston, ("Boston"). In 1976, I was recruited by Deac Finn to join the Guardian's Office, ("G.O."), which I joined after the F.B.I. raid in July, 1977. I became the Branch 2 Director and the Director of the Combat Information Center, ("C.I.C."), both of which are in the G.O. My duties as Branch 2 Director primarily related to internal security, and my duties as C.I.C. Director primarily related to maintaining G.O. files.

4. While working in the G.O., I was involved in numerous intelligence gathering operations and programs against Attorney Michael J. Flynn, LaVenda Van Schaick, Larry Stifler, Janet Troy, Marjorie Hansen, the Lebowitz family, ~~Jose Baptista, and others~~ some of these operations and programs are outlined in this affidavit, but this affidavit is not inclusive of all operations and programs that I was involved in while I was in the G.O., because such operations and programs are too extensive and comprehensive to include in this affidavit.

5. In general, all members of the Boards of Directors of all corporations, including Boston, are required to sign undated resignations in advance of their appointment as a director. For example, in Boston the G.O. prepared a "parallel corporation", of which I served as

one of the directors and for which I was required to sign an undated resignation in advance. The purpose of this corporation was to have it available to transfer all of the assets of Boston in the event that the assets became reachable through legal process.

6. I saw numerous files in the G.O. pertaining to intelligence reports on Paulette Cooper. I saw some files relating back to the period in the mid 1970's involving Paulette Cooper which files contain documents relating to the burglary of the office of Dr. Stanley Cath, Paulette Cooper's psychiatrist, and in connection with operations against Cooper. In October, 1977, the G.O. destroyed, under the direction of a U.S. G.O. Mission, hundreds of sensitive documents relating to Cooper and operations against her. Right up to the time I left the G.O., in March, 1982, there were regular intelligence reports involving Paulette Cooper. From March, 1981 to January, 1982, there were communications, on almost a weekly basis, on the telex line between the U.S. G.O. in California and Boston pertaining to Cooper. For example, it was customarily discussed as routine G.O. policy that the appropriate method of dealing with Cooper was to constantly pressure her and harass her through various means, including the bringing of frivolous lawsuits. In 1981,

the G.O., decided that a lawsuit should be brought against Paulette Cooper and Kevin Flynn in connection with an attempted deprogramming of Ellen and Chris Garrison by Ellen Garrison's parents, the Lebowitz. Even though the G.O. knew at the time of the bringing of the suit, in the summer of 1981, That Paulette Cooper and Kevin Flynn had nothing to do with the Garrison deprogramming, the G.O. dictated the purposes and goals of the suit, the timing of the suit, the parties to the suit and controlled all of the financing of the suit. The suit was brought against Cooper and Flynn to harass them, even though the G.O. knew that they had no personal involvement in the deprogramming.

7. The foregoing Garrison suit was also brought against Kevin Flynn, pursuant to a very specific operation. This operation involved sending Chris Garrison and Ellen Garrison to the office of Kevin Flynn and Attorney Michael J. Flynn, for the ostensible purpose of obtaining information about the Church of Scientology. The two Garrisons were directed, by the G.O., to go to the Flynn office for the purpose of talking to Kevin Flynn and obtaining statements about the deprogramming. The materials obtained in the conversations with Kevin Flynn would then be connected to the Garrison deprogramming, on the grounds that one of the alleged deprogrammers, Joe Flanagan, had told the Garrisons

to either talk to Paulette Cooper or Kevin Flynn if they wanted more information about the Church of Scientology. It was known at the time that the Garrisons went to the Flynn office, that Kevin Flynn and Cooper were not involved in the deprogramming, but it was the intent of the G.O. to "set up the Flynn's" for purposes of pressuring them and harassing them.

8. Operations such as the foregoing and most of the other operations set forth in this affidavit, as well as most operations that I was involved in, while a member of the G.O., were all pursuant to written policy of the G.O. in a Course Pack containing "OPS G.O.". The purpose of these policies is to determine the "position of power" from which an opponent of the Church operates, and to determine what an opponent of the Church "seeks to protect". In connection with these and other considerations, programs and operations are formulated to "attack" both the position of power and the areas that an opponent seeks to protect. For example, in connection with Michael Flynn, the G.O. conducted almost daily operations against him, for a period of almost 2½ years since he first became involved in litigation against the Church of Scientology. In connection with some of these operations, hundreds of telephone calls were made to many people involving Attorney Flynn, some of which were

of an investigatory nature, and many of which were to discredit and harass him. Some of the phone calls included calls to Phyllis Sequeira, one of Attorney Flynn's old clients and friends, for the purpose of suggesting to her that Attorney Flynn had withheld money from her, in connection with some of the cases that he was involved in on her behalf. Although there was no evidence to support this statement, the idea was to separate Attorney Flynn from this particular client, as well as to attempt to have her begin an investigation of Attorney Flynn and perhaps report him to the Board of Bar Overseers. Another call was made to Philip Chesley, one of Attorney Flynn's friends and insurance agent, suggesting to him that Attorney Flynn had murdered the husband of one of his clients. Calls were made to virtually every attorney, on almost every case that Attorney Flynn had ever been involved in, including the Marides Case, the Kemos Case, the Leff Case, and many others. Calls were made to nearly all of Attorney Flynn's clients, including Martha Leff, Peter Marides, and many others.

9. Other operations against Attorney Flynn, involved an operation to plant an individual posing as an independent private investigator within the Flynn office. This person's name was Chuck Malone, and he contacted Attorney Flynn, stating that his name was Chuck North,

that he was a private investigator researching cults, and that he would like to work freely for Attorney Flynn in connection with his research of cults.

10. In one operation against Attorney Flynn, it was determined to "separate" Kevin Sullivan, one of the lawyers working with Attorney Flynn, from him. It was arranged to have Kevin Sullivan's secretary overhear a conversation between two individuals, one of whom was me, in which we stated that Attorney Flynn was in serious trouble with the Massachusetts Attorney General's office as a result of the documents in our possession which were being brought down to the Massachusetts Attorney General's office. It was our purpose to have the secretary give the information to Kevin Sullivan for the purpose of having Sullivan sever ties with Mr. Flynn. On another occasion a similar arrangement was made in which Patty Flynn and Khurshid Bolt, Mr. Flynn's sister and one of his secretaries, were set up in such a way to overhear a conversation that another one of Mr. Flynn's secretaries in his office was a plant. Operations of this type were discussed on almost a daily basis and sent via telex to U.S. G.O., many of which were approved and many of which were not.

11. In connection with another operation against

, Attorney Flynn, in order to separate one of his secretaries from him, it was made to appear that Kevin Flynn, Mr. Flynn's brother, was following the secretary, Silvana Garritano, while she was walking on the street. The G.O. obtained a car similar to Kevin Flynn's, and an individual was set up to approach Silvana as she was walking down the street. As Silvana approached the G.O. agent, she was alerted to the fact that it appeared that someone was following her. At that precise time, a car driven by another G.O. member screeched to a halt, made a sharp u-turn and went screeching down the street.

12. In other operations, Mr. Flynn's clients, such as LaVenda Van Schaick and Tonja Burden, were tailed, numerous calls were made to neighbors from pay telephones, calls were made to the I.R.S. against Mr. Flynn, his banks were regularly called to get bank balances, operations were put into effect against his sister to obtain her trash and place a plant (covert agent) with her boyfriend. The office compound from which Attorney Flynn worked was regularly trespassed upon late at night, for purposes of taking trash from his office compound.

13. Trash was also taken from the street outside the home of Constance Vecchione, of the Board of Bar Overseers, Khurshid Bolt, one of Mr. Flynn's secretaries,

from the Attorney General's office, Dr. Jack Clark, and others.

14. In one instance, an ex-scientologist named Charles Gibbs contacted Attorney Flynn's office which the G.O. learned about from Flynn's trash. Gibbs represented a significant danger to the Church of Scientology because Gibbs had been actually kidnapped and held against his will. Gibbs was paid a refund to keep him away from Flynn.

15. In connection with all of the operations and programs against Attorney Flynn, some of which originated at the local level in the Boston G.O., and some of which originated at the U.S. G.O., information was collected ~~and put together on almost a daily basis and "predictions"~~ as to what Attorney Flynn's activities and intentions were. These were typed up and given, on almost a daily basis, to the various attorneys involved in litigation against him, including Attorney Harvey Silvergate. Mr. Silvergate continually questioned where all of this extremely confidential information was coming from, and he was directed to undertake various courses of action in connection with the pending litigation predicated upon the information obtained.

16. In connection with some of Attorney Flynn's Scientology clients, very specific operations were undertaken

to "separate" them from Attorney Flynn, and to utilize Scientology lawyers to assist in the "separation process". For example, in connection with Jose Baptista, one of Attorney Flynn's Scientology clients, Mr. Baptista's superior, at his place of employment, was called by a G.O. agent impersonating Kevin Flynn. This agent told the superior that Mr. Baptista was greatly indebted to Attorney Flynn and was concerned Baptista might leave the country. At the same time, another G.O. agent obtained the names of various lawyers from Mr. Silvergate and the agent took those names to Mr. Baptista and told Mr. Baptista that he should fire Attorney Flynn, because Attorney Flynn was going to be disbarred and because ~~there were many pending bar complaints against him, some~~ of which had been filed by Mr. Silvergate, and some of which had ~~been~~ filed by the Church, and that Mr. Baptista should hire one of the attorneys whose names appeared on the sheet of paper shown to Baptista. A similar operation of this type was conducted extensively against Silvana Garritano in order to separate Silvana from Attorney Flynn. Again the name of a lawyer given by Harvey Silvergate, Judd Carhart, was given to Silvana by a G.O. agent after numerous operations were conducted against Silvana to make it appear that the Flynn's were

harassing her, such as the incident where she was supposed to be followed by Kevin Flynn. In a similar incident, a very close friend of Silvana's was contacted and given various information with regard to influencing Silvana to fire Attorney Flynn, go to another attorney such as Judd Carhard, and to undertake various actions against Mr. Flynn.

17. In connection with LaVenda Van Schaick, numerous operations, pursuant to the "OPS GOS", were conducted against her, including, but not limited to, the following:

a) LaVenda's auditing files were sent to the BSN G.O. and they were culled for the purposes of obtaining all available confidential and embarrassing information, which was then passed on to various levels within the G.O. Later, when it was learned that Attorney Flynn was aware that the G.O. regularly used auditing files to coerce and attack former members, a program was implemented to make it appear that the information from the auditing files actually came from external forces. In connection with this operation, all the information from the auditing files was used to contact third parties

which the G.O. learned about through the auditing, personnel, ethics, and student files, in order to obtain information from them.

b) LaVenda was tailed actively and her husband, Paul, was tailed as well as her daughter.

c) A phone call was made to LaVenda's employer by a G.O. agent. She was a waitress.

d) When the U.S. G.O. sent the Klingler Mission to Boston in connection with Van Schaick, the purpose of which was to separate LaVenda from her attorney, her husband, Paul was followed while Klingler was sent to LaVenda's home, knowing that Paul would not be there.

e) A G.O. agent called the mother of LaVenda's former husband, who was the father of LaVenda's child, Sabrina, for the purpose of having the father bring an action against LaVenda to obtain custody of Sabrina on the grounds that LaVenda was engaged in various activities which were damaging to Sabrina.

f) On another occasion, a G.O. agent followed Sabrina and talked to her while maintaining surveillance on the Van Schaick home.

g) Various calls were made to neighbors of Van Schaick, she was tape recorded in telephone

conversations with David Aden without her knowledge, and various operations were put into effect, all of which were designed to separate LaVenda from Sabrina, from her husband Paul, and from her attorney. The purpose of pursuing these operations was to pressure her and harass her to such an extent that she would be unable to continue with her lawsuit.

18. There was an operation against McLean Hospital, which was associated with Dr. John Gordon Clark, in connection with which a G.O. agent named Cheryl Ballou was planted as an employee of McLean. She subsequently did steal material from that hospital. In another instance, a plant was placed on the cleaning agency of the Center for Destructive Cultism, a center maintained by Dr. Jack Clark. Shortly after I joined the G.O., I learned of an operation, I believe called "Operation Hydra". The purpose of this operation was to steal all books that had negative information against Scientology, from every library in New England. This type of program would commonly go out to all G.O.'s in the United States. In connection with this operation I learned of a false wall that had been erected in the G.O. Boston, behind which were hidden piles of books that had been stolen from various libraries. After the F.B.I. raids,

these books were destroyed. Behind the false wall were many files containing G.O. operations of a highly secretive nature. One G.O. operation involved an effort, after the F.B.I. raid to cover up all of the illegal activities of the Boston G.O. In connection with this operation, Sandy Cooper went all over the United States obtaining affidavits from individuals who had been involved in G.O. operations, which were of a highly confidential and criminal nature. In Boston, Sandy Cooper worked with Julie Bergman in obtaining affidavits from Kathy Brown, Gary Brown, David Grace, Kathy Grace, Peter Marques, Paula Marques, Bill Foster, Nancy Foster, John Craig, Dave Grybowsky, and Sharon Grybowsky, as well as attempting to obtain affidavits from Robert Dardano and Sue Heffel in connection with the operations, of those individuals, of an illegal nature. I personally saw these affidavits obtained by Sandy Cooper and I know that they were in the possession of the Boston G.O. and the U.S. G.O., and that the contents of such affidavits generally involve the criminal operations that many of these people were involved in, in which they stated that the Church had no involvement and that the operations were conducted by them personally without any responsibility of the Church, all of which of course is a total fabrication. For example, these operations involved the theft of documents from Bingham, Dana & Gould, Dr. Stanley Cath, the

Better Business Bureau, infiltration of the Attorney General's office, and other similar operations. In one operation I gave confidential information about Ron Gollobin, an investigative reporter, to the G.O. which was later telexed up lines in the G.O., for purposes of blocking an investigation by Gollobin, on the Church of Scientology. In connection with this same operation, a girl was employed as a G.O. agent to seduce Michael Taiibi, of Channel 5, for purposes of obtaining confidential information and blocking this investigative effort. To my knowledge these operations were successful, and were among the items collected in the aforementioned affidavits. When I last saw the affidavits they were in the possession of Sandy Cooper.

19. In connection with the attempt by the Lebowitz family to reach their daughter, Ellen, I personally moved Ellen around to various places in the City of Boston for the purpose of hiding her and separating her from her parents when they were attempting to find her and speak to her about the Church. Other Church officials informed the Lebowitzes that they did not know where Ellen was and that they were unable to have her meet with them to discuss her involvement in the Church of Scientology. All of this was a total fabrication because at the same time I was hiding Ellen from

them. Later, as previously stated, the G.O. decided to sue the Flanagan brothers in connection with the parents' attempt to inform her as to what the true nature of Scientology was. Kevin Flynn and Paulette Cooper were targetted in that suit for purposes of pressuring and harassing them, even though the G.O. knew that Kevin Flynn and Paulette Cooper had no involvement in the situation.

20. When I left the G.O., in January, 1982, it had possession of many documents which had been seized by the F.B.I. in the raid of 1977, and which pertained to operations of the Boston G.O. which operations were reflected in documents seized by the F.B.I.

21. There are many operations against numerous
individuals that I was involved in during the five years that I was a member of the Boston G.O., which are too numerous for me to remember and recount for purposes of this affidavit.

22. In connection with the G.O. policy to attack an opponent's "position of power", many intelligence gathering operations and programs were instituted against Mr. Flynn to get him disbarred. It was the purpose of the G.O. to file numerous complaints against Mr. Flynn for whatever reasons could be manufactured, inform all of his clients that he

was being investigated by the Board of Bar Overseers, attempt to get his clients to request investigation of him and eventually to get him disbarred. This was one of the primary goals of the G.O. throughout a period of about 2 1/2 years, and Attorney Silverplate was constantly pressured to file Complaints against Mr. Flynn, including complaints based on materials stolen from Mr. Flynn's office compound.

23. In connection with the destruction of confidential information damaging to the Church, the G.O. destroyed documents in the Baptista and Garritano files which contained information about problems with the Church, people that Baptista and Garritano had disconnected from, etc. These documents were destroyed after a Court order to produce similar documents in the Troy and Hansen cases.

24. The Church has claimed in its lawsuits that the Fair Game Doctrine was cancelled. This is false. Most of the programs set forth in this Affidavit were conducted pursuant to the Fair Game Doctrine. In fact, the alleged cancellation was only for "PR" purposes, but even the alleged cancellation "does not change any policy with regard to the treatment of S.P.".

Signed under the pains and penalties of perjury
this 7 July 82 day of _____, 1982.

Warren H. Friske
WARREN H. FRISKE

COPY₁

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF)
CALIFORNIA,)
)
PLAINTIFF,)
)
VS.) NO. 835052R
)
MICHAEL J. FLYNN,)
)
DEFENDANTS.)
_____)

DEPOSITION OF PETER JOSEPH LISA
TAKEN ON
FRIDAY, FEBRUARY 8, 1985

REPORTED BY: GINA M. VILTZ
CSR NO. 6315

UPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF)
CALIFORNIA,)
)
 PLAINTIFF,)
)
 VS.) NO. 825052R
)
 MICHAEL J. FLYNN,)
)
 DEFENDANTS.)

DEPOSITION OF PETER JOSEPH LISA, TAKEN
ON BEHALF OF THE DEFENDANT, AT 261 SOUTH FIGUEROA
STREET, SUITE 300, LOS ANGELES, CALIFORNIA, 90012, ON
FRIDAY, FEBRUARY 8, 1985, AT 10:15 A.M., BEFORE GINA
M. VILTZ, CSR NO. 6315, NOTARY PUBLIC, PURSUANT TO
NOTICE.

APPEARANCES:

FOR THE PLAINTIFF PETER JOSEPH LISA:
COHN, GLICKSTEIN, LURIE, OSTREN & LUBELL
BY: JONATHAN W. LUBELL, ESQ.
1370 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK, 10019

FOR THE DEFENDANTS:
LEWIS, D'AMATO, BRISKOIS & BISGUARD
BY: JEFFREY A. TIDUS, ESQ.
FIVE PARK-SUITE 300
261 SOUTH FIGUEROA STREET
LOS ANGELES, CA 90012

ALSO PRESENT:
KEVIN GILLETTE

1 A. ESTIMATE, SOMETIME IN LATE '79 OR MID
2 1980, I DON'T REMEMBER EXACTLY.

3 Q. HAVE YOU EVER MET MISS VAN SCHAICK?

4 A. NO.

5 Q. HAVE YOU EVER HEARD OF AN OPERATION
6 CALLED OPERATION SHAKE AND BAKE?

7 A. NO.

8 Q. WHEN WAS THE NEXT TIME AFTER THE
9 CONVERSATION IN ENGLAND THAT MICHAEL FLYNN'S NAME
10 CAME UP IN CONVERSATION?

11 A. ESTIMATE, SOMETIME IN 1980.

12 Q. IN WHAT CONTEXT DID MR. FLYNN'S NAME
13 COME UP?

14 A. AS BEST I CAN RECALL, THAT HE WAS
15 REPRESENTING MISS VAN SCHAICK AND OTHERS WHO I DIDN'T
16 KNOW WHO THEY WERE IN A SUIT AGAINST THE CHURCH.

17 Q. AS FAR AS YOU KNOW, HAS ANY CHURCH OF
18 SCIENTOLOGY AT ANY TIME EVER CONDUCTED ANY
19 SURVEILLANCE OF MR. FLYNN'S -- OR MR. FLYNN.

20 MR. LUBELL: WAIT, BETTER REDO IT.

21 MR. TIDUS: LET ME RESTATE.

22 Q. AS FAR AS YOU KNOW, HAS ANY CHURCH OF
23 SCIENTOLOGY EVER AUTHORIZED OR ORDERED SURVEILLANCE
24 OF MR. FLYNN?

25 A. I HAVE NO FIRSTHAND KNOWLEDGE OF THAT.

26 Q. HAS ANYONE EVER TOLD YOU THAT SUCH
27 SURVEILLANCE WAS ORDERED OR AUTHORIZED?

28 A. NO, WAIT, I ORDERED SURVEILLANCE OF

1 MR. FLYNN'S GARBAGE CANS.

2 Q. WERE THESE HIS PERSONAL GARBAGE CANS
3 OR HIS OFFICE GARBAGE CANS?

4 A. NO, PUBLIC PROPERTY, OFFICE GARBAGE
5 CANS.

6 Q. THESE WEREN'T THE GARBAGE CANS OUTSIDE
7 OF HIS HOUSE, THEY WERE OUTSIDE OF HIS OFFICE?

8 A. OH, NO, THEY WERE -- RIGHT.

9 Q. WHO DID YOU RELAY THE ORDER TO?

10 A. THE A.G. IN BOSTON -- THE A.G.I.,
11 RATHER.

12 Q. WHEN DID YOU ORDER THIS SURVEILLANCE?

13 A. ESTIMATE, MID '80.

14 Q. WHAT WAS THE PURPOSE OF THE
15 SURVEILLANCE?

16 A. TO LEGALLY OBTAIN INFORMATION ABOUT
17 MR. FLYNN'S ILLEGAL ACTIVITIES.

18 Q. WHAT ILLEGAL ACTIVITIES?

19 A. AS IT LATER TURNED OUT, FAMCO,
20 F-A-M-C-O.

21 Q. AT THE TIME YOU ORDERED THE
22 SURVEILLANCE, WHAT ILLEGAL ACTIVITIES DID YOU BELIEVE
23 MR. FLYNN HAD UNDERTAKEN?

24 A. I HAD NO SPECIFICS BUT I KNEW HE HAD
25 SOME.

26 Q. HOW DID YOU KNOW HE HAD SOME?

27 A. A LAW OF PHYSICS.

28 Q. WHAT FACTS DID YOU POSSESS AT THE TIME

1 THAT YOU ORDERED THE SURVEILLANCE THAT LED YOU TO
2 BELIEVE THAT MR. FLYNN HAD UNDERTAKEN ILLEGAL
3 ACTIVITIES?

4 A. MY OWN EVALUATION OF HIS ERRATIC AND
5 UNEXPLAINED BEHAVIOR AGAINST THE CHURCH.

6 Q. DID YOU INITIATE THE ORDER TO START
7 SURVEILLANCE OF MR. FLYNN'S GARBAGE CANS?

8 A. YES.

9 Q. DID THAT ORDER HAVE TO BE APPROVED BY
10 ANYONE BEFORE IT WENT INTO EFFECT?

11 A. IT HAD TO BE CROSS-CHECKED WITH
12 ATTORNEYS TO DETERMINE THAT PICKING SOMEONE'S GARBAGE
13 WAS A LEGAL ACT SUPPORTED BY CASE LAW WHICH I
14 DETERMINED AT LEAST FOUR DIFFERENT CASES INCLUDING
15 DISTRICT COURT CASES THAT IT WAS IN FACT LEGAL TO DO.
16 THEN I ORDERED IT.

17 Q. WHAT ATTORNEY DID YOU CHECK WITH?

18 A. I DON'T REMEMBER.

19 Q. WAS IT SOMEONE EMPLOYED BY THE CHURCH
20 OF SCIENTOLOGY OR WAS IT OUTSIDE LEGAL COUNSEL?

21 A. I THINK IT WAS AN ATTORNEY EMPLOYED BY
22 THE CHURCH OF SCIENTOLOGY AND -- CORRECT.

23 (WITNESS AND HIS COUNSEL CONFER)

24 THE WITNESS: I DIDN'T UNDERSTAND OUTSIDE OR
25 IN-HOUSE.

26 MR. LUBELL: BECAUSE YOU EMPLOY AN OUTSIDE
27 COUNSEL IS EMPLOYED BY A CASE.

28 MR. TIDUS: LET ME REASK IT.

1 Q. WAS IT SOMEONE WHO WAS ON STAFF WITH
2 THE CHURCH OF SCIENTOLOGY OR WAS IT SOMEONE WHO
3 WORKED FOR AN OUTSIDE LAW FIRM WHO WAS EMPLOYED BY
4 THE CHURCH?

5 A. OUTSIDE LAW FIRM.

6 Q. DO YOU KNOW THE NAME OF THE LAW FIRM?

7 A. I HONESTLY DON'T REMEMBER.

8 Q. WAS IT A LAW FIRM IN LOS ANGELES?

9 A. I DON'T EVEN KNOW.

10 Q. WHAT ERRATIC AND UNEXPLAINED BEHAVIOR
11 OF MR. FLYNN'S WERE YOU AWARE OF AT THE TIME YOU
12 ORDERED THE SURVEILLANCE?

13 A. THE AFFIDAVITS ADDENDUM TO THE SUIT,
14 AS I RECALL.

15 Q. THIS IS THE CLASS ACTION SUIT IN
16 BOSTON?

17 A. YES.

18 Q. ANYTHING ELSE?

19 A. NOT THAT I RECALL.

20 Q. WHAT WAS THERE THAT WAS ERRATIC OR
21 UNEXPLAINED ABOUT THE AFFIDAVITS AND ADDENDUMS?

22 A. LIES.

23 Q. WERE THESE AFFIDAVITS BY MR. FLYNN OR
24 BY OTHER INDIVIDUALS REPRESENTED BY MR. FLYNN?

25 A. AS IT LATER TURNED OUT, HE DICTATED
26 AND CHANGED WHAT THEY HAD ORIGINALLY SAID FROM THE
27 INVESTIGATION THAT WE GOT.

28 Q. WHOSE AFFIDAVITS WERE THEY, WHO SIGNED

1 THEM?

2 A. WHO SIGNED THEM?

3 Q. YES.

4 MR. LUBELL: YOU MEAN THE NAME?

5 MR. TIDUS: THE NAME.

6 THE WITNESS: AS I RECALL, VAN SCHAICK, AND I
7 DON'T REMEMBER THE REST OF THEM.

8 BY MR. TIDUS:

9 Q. WAS IT MORE THAN ONE AFFIDAVIT?

10 A. I DON'T REMEMBER.

11 Q. WHAT LIES DID THEY CONTAIN?

12 A. I DON'T REMEMBER AT THIS POINT IN TIME,
13 BUT I REMEMBER HOW I FELT AT THIS TIME WHICH WAS THAT
14 THESE WERE LIES.

15 Q. CAN YOU RECALL ANY UNTRUE STATEMENTS
16 CONTAINED IN THOSE AFFIDAVITS?

17 A. NO.

18 Q. HOW DID YOU LEARN THAT MR. FLYNN HAD
19 DICTATED AND CHANGED THE WORDS?

20 A. FROM DOCUMENTS OBTAINED FROM HIS
21 GARBAGE CAN LATER ON.

22 Q. DO YOU RECALL WHAT DOCUMENTS THOSE
23 WERE?

24 A. HIS DRAFTS, I BELIEVE.

25 Q. HOW LONG WAS SURVEILLANCE MAINTAINED
26 ON MR. FLYNN'S GARBAGE CANS?

27 A. UNTIL THE EVIDENCE WAS TURNED OVER TO
28 THE MASSACHUSETTS BAR ASSOCIATION AND THE

1 MASSACHUSETTS ATTORNEY GENERAL AND I DON'T REMEMBER
2 WHEN THAT WAS.

3 Q. WHAT EVIDENCE ARE YOU REFERRING TO?

4 A. DOCUMENTS, FAMCO AMONG THEM.

5 Q. ANYTHING ELSE?

6 A. THERE WERE A STACK OF DOCUMENTS. I
7 DON'T RECALL WHAT THEY WERE.

8 Q. WERE THE DOCUMENTS WHICH WERE TURNED
9 OVER TO THE MASSACHUSETTS BAR ASSOCIATION AND THE
10 ATTORNEY GENERAL'S OFFICE KEPT IN A SEPARATE FILE?

11 A. I DON'T KNOW.

12 Q. DID YOU SEE THE DOCUMENTS WHICH WERE
13 TURNED OVER TO THE MASSACHUSETTS BAR ASSOCIATION?

14 A. I SAW COPIES OF DOCUMENTS THAT WERE
15 TURNED OVER TO THE CRIMINAL DIVISION OF THE
16 MASSACHUSETTS ATTORNEY GENERAL'S OFFICE.

17 Q. DID YOU SEE THEM BEFORE OR AFTER THEY
18 WERE TURNED OVER?

19 A. I DON'T RECALL.

20 Q. WERE THE COPIES OF THE DOCUMENTS YOU
21 SAW KEPT IN A PARTICULAR FILE?

22 A. THEY WERE A WORK PRODUCT AND TURNED
23 OVER TO ATTORNEYS, WORK PRODUCT OF AN INVESTIGATION
24 AND TURNED OVER TO AN ATTORNEY.

25 Q. DID THE FILE HAVE A NAME ON IT?

26 A. I DON'T REMEMBER, I DON'T KNOW.

27 Q. WHO ACTUALLY WENT THROUGH MR. FLYNN'S
28 GARBAGE CANS?

1 A. I DON'T KNOW, THERE IS A CHAIN OF
2 CUSTODY ON IT AND IT'S FILED. I DON'T KNOW. IT WAS
3 A PUBLIC GARBAGE CAN, IT DIDN'T BELONG TO MR. FLYNN.

4 Q. WHAT ATTORNEYS WERE THE DOCUMENTS
5 TURNED OVER TO?

6 A. I THINK SILVERGLADE, I'M NOT SURE,
7 ESTIMATE IS HARVEY SILVERGLADE.

8 Q. WHEN WAS THE LAST TIME YOU SAW COPIES
9 OF THE DOCUMENTS?

10 A. ESTIMATE, SEPTEMBER, OCTOBER '81.

11 Q. AS FAR AS YOU KNOW, DID CSC MAINTAIN A
12 COPY OF THE DOCUMENTS IN ITS OWN FILES APART FROM THE
13 FILES OF ITS ATTORNEYS?

14 A. NOT THAT I REMEMBER. I WASN'T
15 CUSTODIAN OF THE FILES SO I DON'T KNOW.

16 Q. YOU DON'T KNOW ONE WAY OR ANOTHER
17 WHETHER THEY KEPT A COPY?

18 A. DO NOT KNOW.

19 Q. OTHER THAN THE SURVEILLANCE OF THE
20 GARBAGE CANS OUTSIDE OF MR. FLYNN'S OFFICE, ARE YOU
21 AWARE OF ANY OTHER SURVEILLANCE OF MR. FLYNN'S
22 ACTIVITIES AT ANY TIME CONDUCTED BY ANY MEMBER OF THE
23 CHURCH OF SCIENTOLOGY?

24 A. NOT THAT I RECALL.

25 Q. DO YOU HAVE ANY INFORMATION OR
26 KNOWLEDGE OF ANY SURVEILLANCE OF MR. FLYNN'S AIRPLANE?

27 A. NO, ABSOLUTELY NONE.

28 Q. HAS ANYONE EVER TOLD YOU THAT THEY HAD

March 25, 1980

Yesterday afternoon, about 3:30 p.m., a woman (who refused to identify herself) called and asked to speak to Mr. Michael Flynn "in regards to a case she had some information about and wanted to discuss with him." She said that she wanted to know more about the case's progress from Mr. Flynn.

She refused to identify herself, in spite of the fact that I asked her four or five times, and proceeded to ask personal questions regarding Mr. Flynn. She wanted to know the size of his practice, where precisely he could be located at any given moment, where he was at the time of her phone call, ("a precise location where he could be pinpointed", in her words) where exactly he practiced law, and where else, besides his office, he could be reached. She also wanted to know his home phone.

The woman also asked my name. She sounded very familiar to me, although I've been unable to place her voice. She sounded as though she was attempting to disguise her voice, very nervous and tense.

She stated that she had no phone where she could be reached, that she was calling from a friend's house and felt that giving her friend's number to Mr. Flynn for a return call would be "going too far". She also replied, to my repeated request for her name, that this would be "superfluous information".

Needless to say I told her nothing. She told me she would call back the next day, but I've heard nothing further from her.

Silvana Garritano

April 10, 1980

Dear Mike,

Today, around 4:00 p.m., a gentleman named "Mr. O'Leary" called and asked for you. He stated that he needed to check a reference and that he wasn't sure whether he had the correct "Mike Flynn". He told me that he had two numbers and wasn't sure which one to call. Some time later in the conversation he changed this story to, "Mike gave me this number when I called his home in Waltham."

He wanted to know who I was, whether this Mike Flynn had ten kids, whether he had a brother named Kevin and whether he did live in Waltham. I didn't tell him. He asked me the same questions in a number of different ways. I still didn't tell him. I finally asked him for a phone number, which turned out not to be in service.

This is by no means the first time this has occurred. His "MO" follows the documents we have, regarding getting personal information about a "target" by GO members, exaxctly.


Silvana

Friday
Sept 11

Looked for him, but he knew my name
and he told me that my name was
on the "list" (address list of names)

He said I might meet him at the
club I stayed at and my friends
If I was satisfied with the situation
definitely in my case

He said I had been the president of
the club in a high school
asking me questions and asking if I had
an "American" background (sounding
very) I answered a little from
that point.

Sept 11, 1950

May 1, 1980

To: Mike

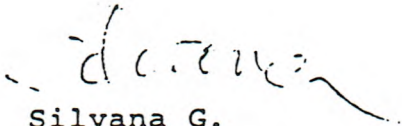
From: Silvana

Re: Continuing Harrassment

Dear Mike;

Yesterday, April 30, a young man came to the window while I was on the phone, pressed his face up against it and stared at me for about four or five minutes with a peculiar expression on his face. I couldn't call anyone because I was speaking to someone on the phone. He just watched me for a few minutes, smiled and walked away when I hung up. He was about 22 or 23, glassy-eyed, heavy set, not well-kempt.

Today, I got another obscene phone call on Jim McCarthy's line. It sounded like a young girl about 16 or 17 years old.


Silvana G.

Andrea Kilroy-Wagner
34 Pebble Path - Marston's Mills, Ma. 02648

November 19, 1981

Michael Flynn, Esq.
12 Union Wharf
Boston, MA, 02109

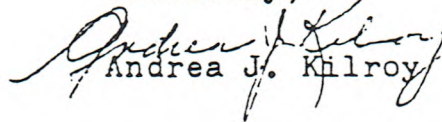
Dear Mike;

I must advise you at this time, that I have been the recipient of a third and fourth harassing telephone calls from an unknown party requesting information from me concerning your business not in any way related to my case .

I find these calls extremely difficult to deal with due to my rather fragile state of emotional and physical health. I do hope that there is some way to stop them for now I am becoming anxious when the phone rings and there is no one here to screen my calls. I also feel that my privacy is being violated by these unwelcome intrusions.

I hope this state of affairs can be corrected quickly.

Sincerely;


Andrea J. Kilroy

Dear Mike;

FEB 19, 80

On February 15 I received
a call asking me if I knew
you I said yes. There is
the city desk were you
happy with you at
allment I said that was
not excellent but to call you
He said we cant reach him
today. He put me on hold
for a few seconds and said
he had to make a deadline.
I said who are you and
what newspaper do you
work for. He said City Desk
we got to meet a deadline
another hotel, and a
woman in the background
said you're in trip.
What was it.

Can we expect more of these
calls and how should we handle?

I called you Mike and didn't
want to put it in writing.

How are you doing? This
case must be a big one.

Watched T.V. on Sunday at
10:30 am and did not expect
you. We watched T.V. all morning
Mugs are going along about
the same dog dumb huh.

Do you ~~they~~ think the
case will go to trial
in the spring?

Yours Fred

CHESLEY & KENTY
INSURANCE AGENCY, INC.

Insurance and Real Estate

PHILIP G. CHESLEY
RALPH W. KENTY

43 DARTMOUTH STREET
MALDEN, MASS. 02148
TELS. (617) 324-4118
324-0352
324-0353

March 7, 1980

Mr. Michael Flynn
Attorney at Law
Townhouse Twelve
Union Wharf
Boston, Massachusetts

Dear Mike,

As per our conversation yesterday, I am writing to confirm that on March 5, 1980 I called the following telephone number - 266-9500. This is, as you know, the Boston number of the Church of Scientology. As you also know from my affidavit, I received a call from an individual purporting to be an insurance investigator who had certain information about you that he felt I should know, to wit: that you had helped arrange the death of a Mr. Sequiera. When I called the above stated number, a young man answered and approximately the following conversation ensued:

Young Man; Hello, Church of Scientology

Me: Is this 266-9500?

Young Man: Yes it is.

Me. I'm sorry, but I must have the wrong number.

Young Man: That's quite alright.

At that point the conversation ended. From this short conversation I am quite certain that the young man who I spoke to was the same person who made the call to my office as an insurance investigator.

I hope somehow this will be useful to you.

Very truly yours


Philip G. Chesley

On February 28, 1980 (Thursday) at approximately 9:45 to 10:00 A.M. I received a telephone call from an individual telling me that he was an insurance investigator and that he had information he would like to pass along to me as a favor. I asked what firm he was associated with and his reply was "I'd rather not say at this time". He then indicated that a claim had been filed with a life insurance company by a Phyllis I. Sequiera on the death of her husband, and that he was investigating the claim. He told me that his case number was #682510. At this point in the conversation I was still not sure exactly why he was imparting this information to me since I had no customer named Sequiera and would have no need of this type of information. He then brought the name Mike Flynn into the conversation by indicating that he was involved. He indicated that Mr. Flynn and Mrs. Sequiera were perhaps somehow involved in arranging the death of Mr. Sequiera by contract with the Mafia, and that I should know this. When I heard the name Flynn I became more attentive. I asked the caller if he would repeat his name and he responded "I gave that to you at the beginning of the call". I responded that I knew that and had written down everything about the conversation except that and would only like to complete by notes on this. He then responded that his name was Williams. I do not remember whether that was the name he gave or not.

My impression of the conversation was that I was talking to someone rather young and uncertain of what he was going to say. The tale he related to me was rather disjointed and it was only by asking questions that I began to make any sense out of what he was saying. I have never been called by an insurance investigator before and told things about an individual I do not know; in this case Mrs. Sequiera. I was in effect being told that Mike Flynn had a hand in arranging the death of Mr. Sequiera through the Mafia.

I am convinced that this call was being made by a member of the Church of Scientology. Mike Flynn alerted me about two months prior to this call that his law school classmates were being called by members of the Church who were posing as UPI "City Desk" and were looking for information about Mike Flynn to use in a book they were writing about Mike. I know Mike is handling a very large law suit against the Church, and that they are attempting to discredit him. Once I heard the name Mike Flynn from the alleged Mr. Williams I knew that I was talking to a Scientologist.

An employee of mine, Miss Elizabeth Kilroy, took a call from this same individual on Feb 27, 1980. He asked for either me or Mr. Kenty, my former partner. He was told that neither of us were in, but that I would be back on the 28th. Elizabeth asked what the call was about and was told that He was an insurance investigator and that he had information about a mutual client that I should know.

The Church of Scientology of Boston

448 Beacon Street, Boston, Massachusetts 02115 Phone: (617) 266-9500, Telex: 94-0297



April 15th, 1981

To Whom It May Concern:

Enclosed is an article written by Richard Wieland of FREEDOM NEWS SERVICE out of Los Angeles. The article concerns Boston malpractice attorney Michael J. Flynn and contains some rather interesting material on the methods used by Atty. Flynn.

I hope you find this interesting and would welcome any comments, suggestions or questions you may have. Please feel free to contact me either in writing or by phone.

I think it is actions such as those described in Mr. Wieland's article which has given the legal profession a bad name - in those limited areas in which its reputation has in fact suffered.

Sincerely,

David Aden
Public Affairs
266-9500 ext. 47

BOSTON BARRISTER DRAWS PEERS' IRE THE MALPRACTICE GAME:



by R. Wieland

BOSTON (FNS)—While attorneys are usually reluctant to criticize the professional conduct of their peers, the behavior of Boston malpractice attorney Michael J. Flynn has drawn not only criticism but a complaint to the Massachusetts Bar Association.

Specializing in multi-million dollar malpractice suits, Flynn has become a pariah amongst some Boston jurists who see him operating "in the gutter."

Flynn entered the lucrative field in the early 1970's and was rewarded handsomely when a single medical malpractice case brought him \$100,000 in fees. While the field seemed to be unlimited Flynn and others were about to have the door shut on their pursuit of the ambulance.

Flynn was caught in one backlash when malpractice suits against Boston doctors brought the medical profession together to fight the malpractice attorneys who were driving up insurance premiums.

Malpractice is already laced with emotionalism when victims claim their livelihood has been ruined. But attorneys too often seek to drive up the compensation to drive up their share of the award and everyone suffers, according to experts. No-fault car insurance was the result of skyrocketing awards, and Boston responded with a similar program to sidetrack the "ambulance chasers."

Cases were being brought with little or no merit, on the hope (often successful) that a settlement would be achieved merely to avoid the time and expense of litigation. As the cases piled up in the courts and the awards grew into the millions of dollars, the medical profession struck back. A tribunal was formed in 1975 to hear all Boston malpractice cases. Plaintiffs had to post a \$2000 bond to cover the cost of the hearing should the doctor be exonerated. If found guilty, a settlement was sought. Only in the last resort was the matter taken to court.

While few attorneys were pleased with the concept, the number of malpractice suits and their awards plummeted. The runaway inflation of insurance premiums that had been driven up by malpractice lawyers such as Flynn was at last arrested. Still, the costs were passed on to patients and medical care costs remained higher than ever.

With the tribunal in operation, Flynn's practice began to suffer. Case after case was dismissed and the immense profits originally envisioned began to fade. From a \$100,000 fee only a few years before, Flynn ended up on a divorce case with only \$8000 at issue. According to a Boston investigator, Flynn began to shuffle mortgages to maintain his affluent Boston life-style.

While the nature and value of his cases changed drastically, Flynn's abrasive conduct did not. Even when representing a

former restaurant employee in a wage dispute, his tactics irritated other attorneys. One of the partners in the Boston firm of Choate, Hall and Stewart called Flynn a "bristly type" who will argue for the sake of an argument alone. "Flynn tries to prejudice the judge by mostly contrived assertions," another attorney commented. "One has to drag him back to meet the point before the judge."

When marital, credit card and employee disputes could not provide the financial rewards of medical malpractice, Flynn began to look for new "deep pockets," as one attorney characterized the search for money.

Coincidentally, an alarming new trend appeared — clerical malpractice. Clergymen and churches had begun to replace doctors and hospitals as a prospective source of income for the malpractice attorney.

A Christian Science church and two practitioners were sued by a couple when prayer failed to save their dying son. A minister with Grace Community Church in Los Angeles was sued when a young man he counseled later committed suicide. (Psychiatrists who had tended him a few days before were not sued, however.)

"The church is no longer a sanctuary," said Don Schlachtenhaufen of Church Mutual Insurance Co., which has been insuring churches against fire and other losses since 1878. "There was a time when the church doors were left open and nothing was taken. Now churches are being burned and robbed like everyone else; they're also being sued like everyone else."

Flynn saw the new market and, like a riverboat gambler whose ship had sunk, he went ashore to ply his trade. For whatever reason, he chose the fast-growing Church of Scientology as his target. Recruiting several former members on a "contingency" agreement (Flynn's fee would be a percentage of the award or settlement — about 40%), Flynn filed a lawsuit that topped anything Boston had ever seen in its medical heyday—\$200 million was demanded. The best part was that there was no tribunal to interfere.

Initially, reporters lapped up the astounding figure and the inflammatory allegations. However, a major Los Angeles attorney who viewed the suit found it to be frivolous and essentially doomed. The suit suffered, he said, from Flynn's mistaken belief that he knew what he was doing. In fact, Flynn has done virtually nothing to pursue the suit since its filing over a year ago.

Instead, Flynn has gone to the media and paraded his clients before the press.

But the publicity campaign began to backfire. When defense attorneys pointed out that four linear feet of documents filed by Flynn had nothing whatever to do with the case, but were solely to stimulate media interest, the court threw out every scrap of "evidence" Flynn had filed.

As Flynn's new enterprise began to falter, he found himself in need of new ways to boost his financial prospects. Anti-Scientology writer Paulette Cooper provided the inspiration.

Already in litigation with the church, Cooper had also been looking for publicity for her suits, and a joining of forces apparently seemed mutually beneficial. Cooper became one of Flynn's clients.

Cooper was already familiar with Flynn's tactics. She had told a Washington, D.C., investigator that Flynn had illegally coached a former Church member in preparation for sworn testimony. But such tactics did not bother Cooper. Railing against "stupid honesty," Cooper has admitted that she, too, was illegally coached by suspended attorney-friend John Settren, who is "extremely dishonest" and does it because he

"needs money." Cooper even admitted to perjury. Flynn knows about Cooper's admissions.

Meanwhile, less excessive attorneys have drawn Flynn's wrath. When one lawyer representing the Church of Scientology took a legitimate deposition of one of Flynn's clients, Flynn tried to get the attorney fired from his part-time position at a Boston university. The attempt failed, leaving bitter feelings amongst Boston jurists. It caused one Boston barrister to remark, "We aren't going to get down in the gutter with him."

Flynn's behavior was the subject of a complaint filed with the General Counsel of the Massachusetts Bar Association. According to the inch-thick complaint filed by the Church, Flynn and his associates had harassed church members, deceived the court, filed suits merely for publicity and obstructed fact-finding processes during the litigation.

At the same time, a Boston court granted a Church request that documents stolen from the Church be returned by Flynn. Some of the material was retained by the court as part of the litigation brought against Flynn. The Church even had to go to Las Vegas to seek judicial relief when it was found Flynn was improperly soliciting funds and clients to beef up his publicity campaign.

A fellow Boston attorney summarized it by noting that Flynn's problem is that "he pretends he's a very famous lawyer." But, he said, "The proof of the pudding is what happens in the courtroom. There's a point where you have to stop B—S—ing and be a lawyer."

AFFIDAVIT OF FORD MARTIN SCHWARTZ

I, Ford Martin Schwartz, of 825 Oak Grove Road, Concord, California, hereby depose and state under the pains and penalties of perjury as follows:

1) This affidavit is based upon personal knowledge and also upon information and belief where so stated.

2) In spring, 1980, I was "recruited" to work for the "Guardian's Office" (G.O.) of the Church of Scientology. I worked for Branch 1 of the Guardian's Office which is

concerned with external intelligence gathering. Another function of the G.O. is that of an internal secret police. The primary contacts that I had in the G.O. were Chris Vetter, Bill Craig, and Michael Woods.

3) In late 1980, I was assigned to a project, the purpose of which was for me to become a public opinion leader in the anti-cult field and among those who were investigating Scientology. This mission was assigned to me by Bill Craig, and later confirmed by Michael Woods, both of whom were holding the position of Assistant Guardian for Information. Other G.O. officers confirmed at various points in time the purpose of this mission.

4) The purpose of becoming a public opinion leader against the Church of Scientology was so that I could infiltrate and penetrate any individuals or groups opposed to the Church including Attorney Michael J. Flynn of Boston, Massachusetts, who I referred to in conversation with other G.O. personnel as "The Flynn Network". However, specific limitations and delineations were at times imposed by my G.O. superiors as regards to my activities involving Michael Flynn and his associate attorneys in Boston.

J.S

5) In connection with this project, I maintained my position with the "Freedom Counseling Center" in Burlingame, California as a "counselor" or "deprogrammer". I had previously secured this position in November 1980 as a consequence of another G.O. project.

6) A great deal of the information that I gathered concerning anybody who criticized the Church of Scientology I would pass on to the G.O.

7) In January 1981, I contacted Attorney Michael Flynn for the purpose of becoming his client in order to bring a potential lawsuit against the Church. This particular mission was very closely monitored by the G.O. For this purpose, I used Henrietta Crampton of the Citizens' Freedom Foundation in Redondo Beach, California. She was well known in the anticult field and did not suspect that I was a Scientology agent. In my initial contact I informed Attorney Flynn of my cover story, whereupon he transferred me to Kevin Flynn, who requested that myself and my wife write out a "statement" of our experiences within the Church of Scientology. After receiving clearance from the G.O., I sent an unsworn statement to Michael Flynn in February 1981. At that time, Bill Craig again informed me that the Flynn office had been penetrated and that the G.O. had secured

extensive information about the "Flynn Network".

Craig told me this time that the purpose of contacting Attorney Flynn at that time was to obtain credentials as an anti-Scientologist which would be enhanced because of my association with the "Flynn Network". These credentials could be used for other intelligence gathering or espionage operations.

8) Craig informed me on numerous occasions that the Flynn office had been penetrated and that it was in the process of "taking him down" through lawsuits and disbarment proceedings.

9) In May 1981, Craig informed me that he wanted me to attend a meeting, in the Flynn office which was taking place around May 10, 1981 among various lawyers throughout the country who were involved in Scientology litigation. This meeting was taking place in Boston, Massachusetts, and Craig authorized the payment of G.O. or Church money to fly to Boston for the purpose of "penetrating" this meeting. Craig told me that all expenses for the trip, including airfare, hotel bill, etc., would be covered by cash from the G.O. I then flew to Los Angeles where I met with Gary Lawrence, and Jeff Sherrel, both of whom were G.O. opera-

tives. Sherrel introduced himself as the person in charge of U.S.G.O. Branch 1 activities for the Northeast sector, which included Boston and New York. They both briefed me on various Flynn activities and this "briefing" indicated that they had an extensive knowledge of the operations of Attorney Flynn's office. The total expenses for this trip were \$1,169.94 all of which was paid to me in cash by Sherrel or Craig before and after the meeting in Boston.

10) After this "briefing", I flew to Boston where I waited briefly in a room from which I could overhear a few closing comments by Michael Flynn in the meeting of attorneys and also met with Fred Joseph, an attorney from Washington, D.C. in regard to my own case. I reported the details of the meeting that I had obtained to the G.O. including how many I saw in attendance, the names of those I was introduced to, and specifically whatever I heard stated to the best of my ability to recall. At no time during this meeting did I ever hear Michael Flynn mention Flynn Associates Management Company (FAMCO) or that FAMCO would in any way participate in the fee relationship, nor did I report to the G.O. or make any mention of FAMCO.

11) After the meeting, I was thoroughly debriefed by Jeff Sherrel and Gary Lawrence and they informed me that

J.S.

"Flynn's days were numbered" and that they were in the process of "taking him down".

12) Later I used my contacts with Attorney Michael Flynn to further establish my credentials among anti-Scientists, wherein using this cover I became involved in numerous operations into situations to which I would not have been privy without the Flynn cover.

13) On one occasion, Bill Craig informed me that his supervisor, Peter Alvette, said that one of the means that the G.O. had used to penetrate the Flynn office was the placement of Silvana Garritano there as his secretary. Craig informed me that after Garritano was placed as a G.O. agent, Chris Vetter related being present at a big party at the U.S.G.O. after the announcement to the other branches of the U.S.G.O. that Garritano was openly taking steps to get Flynn disbarred with the claim that Garritano was used to sign a false affidavit under the duress of Michael Flynn. Craig informed me that Flynn would be disbarred shortly with the Garritano operation. Several times I was informed by G.O. personnel that the Church of Scientology had received legal advice which was being followed by the Church of Scientology and that therefore the G.O. public relations

bureau had ceased the public dissemination of information against the impending disbarment of Flynn so that the Massachusetts Bar Association would not view it as a media campaign.

14) I learned later that one of the attorneys who was present at the May 1981 meeting was Greg Hull of San Francisco, California. As a result of my connection with the Flynn office I was able to penetrate Hull concerning the number of potential litigants against the Church in the San Francisco area. On many occasions, I was requested by Bill Craig, operating he stated on urgent requests and orders from the U.S.G.O. to intimidate Hull and prevent him from bringing cases against the Church of Scientology by in part, informing him of the impending Flynn disbarment using the claim that Silvana Garritano had been forced to sign a false affidavit.

15) I was, at one point, informed that Michael Flynn was being followed, that he looked terrible, and that the operations against him were extremely successful.

16) In connection with my nationally established position, I received weekly calls from sources throughout

the United States, including Paulette Cooper, providing me with information of the activities of Michael Flynn and the cases he was involved in against the Church.

17) Around November 1981, an individual named Joan Eden was referred by myself to Greg Hull for the purpose of representing Ms. Eden in a lawsuit against the Church for fraud in connection with the Church's promise to cure her leukemia. Ms. Eden contacted the Freedom Counseling Center, though I refused to see her as a client. Clearly stating this fact to both Lowell Streiker (the Executive Director of the Freedom Counseling Center who Ms. Eden was seeing) and to Ms. Eden, I was able to debrief her on her legal situation. I learned that her previous attorney in Sacramento had discovered discreditable information regarding Ms. Eden's past history and had been discouraged from pursuing her suit. Another member of the counseling center, Lowell Streiker, met with Ms. Eden and several members of the G.O. After that meeting, I met secretively with Woods and Jeff Shivelle, the Comptroller's Assistant for Information who had been meeting that day with Lowell Streiker and Ms. Eden. I reinformed Woods of the inside information previously gathered and reported to him. Eden had paid a considerable amount of money to the Church including taking out a mortgage

on her home in order to come up with money to pay for auditing in order to cure her leukemia. Later, after the G.O. successfully prevented a settlement from going through, Eden died, and the G.O. became extremely concerned that the Church of Scientology could be made subject to a successful wrongful death suit.

18) In January 1982, I received a partial copy of the "Flynn Report" to the Clearwater City Commission about the Church of Scientology. In connection with this Report, and a biography of L. Ron Hubbard done by Michael Linn Shannon and the facts of a deprogramming I was currently involved in, I learned things about Scientology and L. Ron Hubbard which stunned me into a realization about what I was doing. I then went to Margaret Singer, a well known psychologist involved in cult cases and informed her of some of the types of things that I had been doing. Subsequently, I went to the Federal Bureau of Investigation and to the Justice Department concerning my activities. The G.O. was unaware of the fact that I had gone in such a manner to Dr. Margaret Singer, the Justice Department or the F.B.I.

19) In March 1982, Michael Woods and Peter Alvette were ordered to go to Boston, where I met with Woods. Woods

J.S.

told me that the reason he was in Boston was to get new agents into the Flynn office because the last mission seeking to penetrate the Flynn office had failed. He told me that since they had lost their last agent inside the Flynn office, the only line they had in on him was his garbage. He told me that although Flynn now had a shredder, the G.O. was still able to piece the shredded pieces back together, and that they had an individual who was a specialist in connection with such operations. Woods told me that he had a list of 160 people who were then being considered as new agents to penetrate the Flynn office. These agents were in the process of being recruited by the G.O. Woods requested that until another agent could be successfully placed in the Flynn office I re-establish my penetration. At that time, after several meetings with Woods, in which he pleaded and urged that I conduct the type of penetration described, I agreed. Although I was secretly out of Scientology at that time, and had already gone to the FBI, I had previously discussed at length the reason why I couldn't penetrate the Flynn office further including the fact that Flynn would likely use me as a witness placing me in a position wherein to keep my cover I would have to perjure myself and which I had stated many times, I would not do. Woods told me that I should state various "half truths" without stating that I should directly perjure

J.S.

myself. At the time, I was caught in between having gone to the FBI without the G.O. knowing it, and still being considered an internal double agent for the G.O. Woods requested that I call Attorney Thomas Hoffman from the Flynn office and use my uneasiness regarding the credibility of L. Ron Hubbard, Jr. as a reason for the discussion. I pretended extreme nervousness after being present at the Center on Destructive Cultism in Weston, Mass. with a freshly deprogrammed Scientologist while present at the same moment was a server attempting to serve Dr. Jack Clark with his second Scientology suit. I used nervousness of my cover being blown as a device to cover my return to San Francisco, wherein Woods called me repeatedly seeking to use me to prevent L. Ron Hubbard, Jr. from testifying in Clearwater. I refused all of the operations that he wanted me to participate in for the foregoing purpose. Woods told me that the operation to prevent L. Ron Hubbard, Jr. from testifying had become a top level G.O. order and that I was to use all of my credentials in connection with Flynn and with Hubbard, Jr. in order to prevent Hubbard, Jr.'s testimony.

20) On April 13, 1982 an individual whose name

was "Steve" came to meet me with Michael Woods and informed me that he, Steve, was in charge of a mission called "All Clear" in order to get Hubbard's name off all of the litigation against the Church of Scientology. They further informed me that an individual named Gerry Armstrong had recently defected and that Armstrong had been working with Omar Garrison concerning a forthcoming biography about Hubbard. They informed me that Armstrong had defected and that Armstrong had had access to L. Ron Hubbard, Jr.'s B-1 file, which contained correspondence between myself and Hubbard, Jr. They told me that Armstrong had been in touch with L. Ron Hubbard, Jr. since his defection and they feared he might be able to deduce I was a double agent for the G.O. Steve ordered me to disseminate information that Armstrong was actually a G.O. agent and was not to be believed by opponents of Scientology. I advised him that this would be stupid and that Paulette Cooper would love to subpoena Gerry Armstrong. Steve then recinded the order.

21) Subsequently, I contacted Paulette Cooper, who was involved in litigation against the Church of Scientology, and Michael Flynn and informed them that from November of 1980 until January of 1982 I had been operating as a double agent for the Church of Scientology. Mr. Flynn requested me

to prepare a statement relative to my activities. Although the operations I have been involved in cover hundreds of situations in which I acted as an espionage agent for the G.O. passing on information to them and doing what they requested me to do, this affidavit is merely intended to be a general outline of operations I was involved in against Michael Flynn.

Signed under the pains and penalties of perjury
this 9th day of July, 1982.


FORD MARTIN SCHWARTZ

Law Offices of
MICHAEL J. FLYNN
Twelve Union Wharf
Boston, Massachusetts 02109

Faneuil Hall Office
One Faneuil Hall Marketplace

Telephone
(617) 523-1844

June 2, 1981

Jay Roth, Esquire
617 South Olive Street
Suite 510
Los Angeles, California 90014

Dear Mr. Roth:

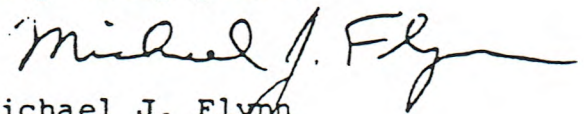
The Church has made several recent requests for a demand and/or settlement discussions in connection with the Burden case in Florida. These requests have been made by local counsel of the Church in Tampa to our local counsel in the Tampa case.

It would be appropriate in the future to direct all proposals or settlement initiatives to this office.

.. Despite the breakdown of the previous settlement discussions, perhaps it would be fruitful for the Church to make a proposal for the settlement of all existing cases. Such a proposal should be made within the next 14 days because additional 8-10 cases are in the process of being commenced in Washington, New York and Los Angeles.

I would suggest that a reasonable offer for all pending litigation, an agreement for no future litigation involving this office, and a return of all "Washington documents" should be made with no other conditions or contingencies except releases and that the proposal should be not less than 1.6 million dollars.

Very truly yours,


Michael J. Flynn

MJF:lf

Carson Taylor
Jay D. Roth
Gregory Mooney
Robert A. Bush
Anita Knowlton
Robert Kropp, Jr.
of Counsel
Barrett S. Litt

TAYLOR & ROTH
A Law Corporation

617 South Olive Street
Suite 510
Los Angeles, California 90014
(213) 623-8000

June 10, 1981

Michael J. Flynn, Esq.
Twelve Union Wharf
Boston, Massachusetts 02109

Dear Mr. Flynn:

I have received and reviewed your letter of June 2, 1981 and discussed the same with my clients. I am instructed to advise you that my clients remain interested in discussing the resolution of pending and future litigation.

While this interest exists, your letter is somewhat ambiguous as to which cases are included in your proposal for the Church to make a proposal. In particular, are you proposing that you have authority to resolve all existing litigation including all of the Florida cases? If so, it is necessary to have this continued in order to consider the formulation of a proposal.

Furthermore, it would be somewhat ludicrous to resolve the existing litigation and have some agent or associate of yours provide a new series of cases that have yet to be filed. Therefore, any settlement discussion must have as a prerequisite your authority to resolve those cases that you have referred to other counsel.

I am looking forward to your prompt response to this letter.

Very truly yours,
TAYLOR & ROTH
A Law Corporation

JAY D. ROTH

JDR:ls

Robert A. Bush
Walter Cochran-Bond
A. Thomas Hunt
Anita Knowlton
Robert Kropp, Jr.
Gregory Mooney
Jay D. Roth
Carson Taylor

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Telecopier (213) 623-8002

August 5, 1981

Michael J. Flynn, Esq.
Twelve Union Wharf
Boston, Massachusetts 02109

Dear Mr. Flynn:

I have been instructed by my client to advise you that based upon recent developments in the litigation with your firm and its associates, that the Church of Scientology of California is no longer interested in pursuing settlement as proposed by you at this time.

While my client is not currently interested in your settlement proposals, I would like to confirm the continued existence of my client's refund policy. I suggest that you advise your clients that refunds are still available to them if they are willing to execute appropriate releases.

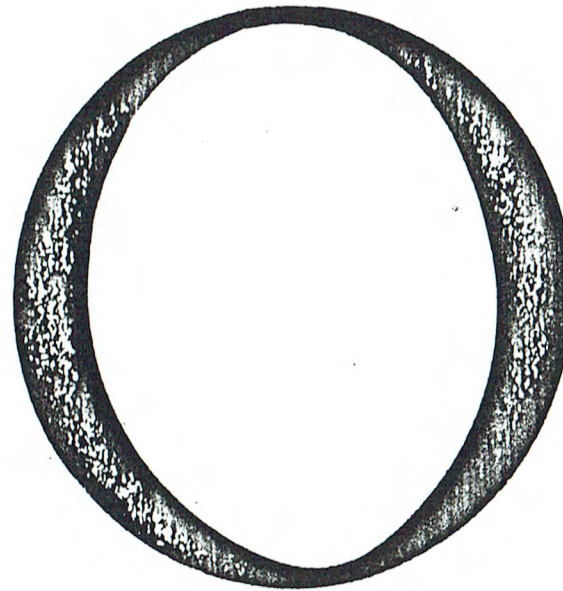
Very truly yours,

TAYLOR & ROTH
A Law Corporation

JAY D. ROTH

JDR:ls

MAGAZINE ARTICLES ON
LEVEL



CHECKSHEET
BY L. RON HUBBARD

THE AMERICAN ST. HILL ORGANIZATION

In other words, do not, at any moment leave this act unpunished, for, if you do you are harming all other Scientologists in the area. When you are attacked it is your responsibility then to secure from further attack not only yourself but all those who work with you. Cause blue flame to dance on the court house roof until everybody has apologized profusely for having dared to become so adventurous as to arrest a Scientologist who, as a minister of the church, was going about his regular duties. As far as the advances of attorneys go that you should not sue, that you should not attack, be aware of the fact that I, myself, in Wicnita, Kansas, had the rather interesting experience of discovering that my attorney employed by me and paid by me, had been for some three months in the employ of the people who were attacking me, and that this attorney had collected some insignificant sum of money after I hired him, by going over to the enemy and acting upon their advices. This actually occurred, so beware of attorneys who tell you not to sue. And I call to your attention the situation of any besieged fortress. If that fortress does not make sallies, does not send forth patrols to attack and harass, and does not utilize itself to make the besieging of it a highly dangerous occupation, that fortress may, and most often does, fall.

The DEFENSE of anything is UNTENABLE. The only way to defend anything is to ATTACK, and if you ever forget that, then you will lose every battle you are ever engaged in, whether it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. DO, yourself, much MORE CHARGING, and you will WIN. And the public, seeing that you won, will then have a communication line to the effect that Scientologists WIN. Don't ever let them have any other thought than that Scientology takes all of its objectives.

Another point directly in the interest of keeping the general public to the general public communication line in good odor: it is vitally important that a Scientologist put into action and overtly keep in action Article 4 of the Cole: "I pledge myself to punish to the fullest extent of my power anyone misusing or degrading Scientology to harmful ends." The only way you can guarantee that Scientology will not be degraded or misused is to make sure that only those who are trained in it practice it. If you find somebody practicing Scientology who is not qualified, you should give them an opportunity to be formally trained, at their expense, so that they will not abuse and degrade the subject. And you would not take as any substitute for formal training any amount of study.

You would therefore delegate to members of the HASI who are not otherwise certified only those processes mentioned below, and would discourage them from using any other processes. More particularly, if you discovered that some group calling itself "precept processing" had set up and established a series of meetings in your area, that you would do all you could to make things interesting for them. In view of the fact that the HASI holds the copyrights for all such material, and that a scientific organization of material

can be copyrighted and is therefore owned, the least that could be done to such an area is the placement of a suit against them for using materials of Scientology without authority. Only a member of the HASI or a member of one of the churches affiliated with the HASI has the authority to use this information. The purpose of the suit is to harass and discourage rather than to win.

The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, well knowing that he is not authorized, will generally be sufficient to cause his professional decease. If possible, of course, ruin him utterly.

A D.ScN. has the power to revoke a certificate below the level of D.ScN. but not a D.ScN. However, he can even recommend to the *CECS of the HASI that D.ScNs. be revoked, and so any sincere Scientologist is capable of policing Scientology. This is again in the interest of keeping the public with a good opinion of Scientology, since bad group processing and bad auditing are worse than bad publicity and are the worst thing that can happen to the general public to general public communication line.

The best thing that can happen to it is good auditing, good public presentation, and a sincere approach on the subject of Scientology itself. Remember, we are interested in ALL treatment being beneficial, whether it is Scientology or not. For bad treatment in any line lowers the public opinion of all treatment.

In addressing persons professionally interested in the ministry, we have another interesting problem in public presentation. We should not engage in religious discussions. In the first place, as Scientologists, we are gnostics, which is to say that we know what we know. People in the ministry ordinarily suppose that knowingsness and knowledge are elsewhere resident than in themselves. They believe in belief and substitute belief for wisdom. This makes Scientology no less a religion, but makes it a religion with an older tradition and puts it on an intellectual plane.

Religious philosophy, then, as represented by Scientology, will be opposed in such a discussion to religious practice. We are denominational rather than non-denominational, and so we should be perfectly willing to include in our ranks a Moslem, or a Taoist, as well as any Protestant or Catholic, while people of the ministry in Western civilization, unless they are evangelists, are usually dedicated severely to some faction which in itself is in violent argument with many other similar factions. Thus these people are ready to argue and are practiced in argument, and there are more interpretations of one line of scripture than there are sunbeams in a day. Beyond explaining one's all-denominational character, explaining that one holds the Bible as a holy work, one should recognize that the clergy of Western Protestant churches defines a minister or the standing

*Committee for Examinations, Certification and Services.

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of the Supreme Judicial Court

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BOSTON, MASSACHUSETTS 02108

617/720-0700

August 27, 1982

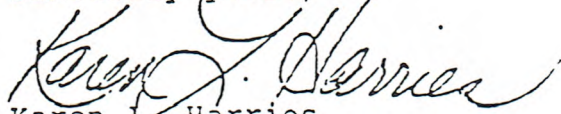
Hon. John E. Powers
Clerk
Supreme Judicial Court
Court House
Boston Ma. 02108

RE: Michael J. Flynn, Esq.
12 Union Wharf
Boston, Ma. 02109

Dear Mr. Powers:

The records of this Board have been checked and show that
the above-named attorney is registered and that no complaints
are filed and pending with this Board against him/her.

Sincerely yours,


Karen L. Harries
Administrator

KLH/pav

Carson Taylor
Jay D. Roth
Gregory Mooney
Robert A. Bush
Anita Knowlton
Robert Kropp, Jr.
of Counsel
Barrett S. Litt

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617 South Olive Street
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February 20, 1981

Michael J. Flynn, Esq.
12 Union Wharf
Boston, Massachusetts 02109

Re: Church of Scientology

Dear Mr. Flynn:

This is to confirm our conversation of this date regarding the claims of Donald and Peggy Bear against my client, the Church of Scientology. It is my understanding that we reached agreement with respect to the settlement of these individuals' claims and made further understandings as itemized below:

1. You will forward to my office immediately verifications of monies paid to the Church of Scientology by Mr. and Ms. Bear in the sum of \$107,948.88. Said verifications shall be in the form of receipts from or cancelled checks reflecting payment to the Church of Scientology.

2. In exchange for full and complete releases from your clients, Mr. and Ms. Bear, the Church of Scientology will pay the sum of \$117,948.88. Said sum shall be paid by cashier's or certified check no later than March 6, 1981. The payment of said monies are contingent upon timely receipt of the verification described above.

3. I will be drafting the releases to be executed by your clients and forwarding them to your office at the beginning of next week. The releases will be provided to either myself or representatives of the Church at the time of the tender of the sum described above.

4. We both agreed that this settlement and the letter describing the settlement are confidential and shall not be disclosed to any other party other than our respective clients.

Michael J. Flynn, Esq.

February 20, 1981
page two

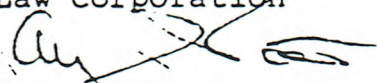
5. We agreed that your firm and the Church would initiate no new litigation against each other for a period of two (2) weeks. This agreement does not extend to actions with respect to litigation already on file.

6. We agreed to tentatively schedule a meeting for March 6, 1981. The time and place of the meeting is to be set in our discussions next week.

If this does not confirm your understanding of our agreement, please contact me immediately.

Very truly yours,

TAYLOR & ROTH
A Law Corporation


JAY D. ROTH

JDR:ls
cc: Keith Frost

SCIENTOLOGY'S WAR AGAINST JUDGES

BY JAMES B. STEWART, JR.

On September 5, 1980, as U.S. District Court Judge Charles Richey was recuperating from two pulmonary embolisms and exhaustion, lawyers for the Church of Scientology and the Justice Department gathered before Judge Aubrey Robinson, Richey's successor in the two-year-old conspiracy case against 11 members of the Church of Scientology. Judge Richey had already convicted and sentenced nine of the original 11 defendants, but the remaining two, recently extradited from England, were about to go on trial.

"Particularly from the standpoint of your Honor's feelings about these defendants who are members of the Church of Scientology..." began John Shorter, Jr., a lawyer for one of the defendants. He was interrupted by Judge Robinson. "You want to raise a motion to recuse?" the judge asked. He knew what Shorter's remark foreshadowed, having witnessed the "Scientologists' campaign to drive Judge Richey off the case. "Is this a fishing expedition?"

Robinson is the fourth D.C. district court judge to preside over the Scientology case and the latest target of the Scientologists' self-proclaimed "attack" litigation strategy. Their strategy amounts to an all-out war against the D.C. district court judges, a war much more sophisticated, better financed and more successful than the bizarre tactics used by some other groups against their courtroom adversaries, such as Synanon's attempt to murder an opposing counsel by putting a rattlesnake in his mailbox.

Unlike Synanon, the Church of Scientology has long sought to distinguish itself as a legitimate religion. Founded in 1954 by L. Ron Hubbard, a science fiction writer, philosopher and author of the best-selling book *Dianetics: The Modern Science of Mental Health*, the church claims five million adherents to its self-help philosophy. The Church of Scientology has called itself the spiritual heir of Buddhism in the western world, and focuses on what it calls "pastoral counseling" to increase its members' abilities and awareness.

But in the past few years, the church has been accused of brainwashing and harassing its members, and it has become embroiled in dozens of lawsuits (see sidebar, page 32), including the 1978 criminal conspiracy charges against 11 of its members. Such setbacks have triggered increasingly militant responses, which focused, in the conspiracy case, on the federal judiciary. The Scientologists' legal strategy has been to force the recusal of every judge assigned to that case.

Judges lie at the root of the pending criminal charges against the Scientologists. In 1976, D.C. District Court Judge George Hart, Jr., casually proposed a deposition of Hubbard in conjunction with one of many Freedom Of Information Act suits filed by the church. Hart's remark (no deposition ever proved necessary) caused Scientology officials to believe that the government knew something incriminating about Hubbard. As a result the

church intensified its efforts to learn what information the government might possess.

At the same time, the church was issuing "Guardian Programme Orders" (directives to church members) telling them to use "standard overt sources" and "any suitable guise interviews" to monitor the activities of all district court judges presiding in the FOIA suits. In 1977 that directive was extended to all 15 active judges in the D.C. federal district court.

Posing in some instances as students and journalists, Scientologists interviewed the judges, researched their careers and backgrounds, followed them and prepared dossiers. According to Scientology documents, their goal was to determine "tone level" and "burtons on"—indicia of personal vulnerability, in the parlance of Scientology. But the church's operation

church members. This was Boudin's first association with the church, but Hirschkop had handled a search and seizure matter for the church in 1977.

One lawyer who represents Scientologists and has worked with Boudin and Hirschkop offers this ideological defense for their taking the case: "It is a simple case of government overreaching," he says. "The government just can't tolerate an organization with nonconforming beliefs. The Scientologists stand up for their rights—aggressively." Another lawyer who has worked on the case adds a financial motive for their taking such a case: "These people pay their bills—top dollar and on time—which is more than I can say for most of my unpopular clients. This case will finance a lot of pro bono work." Hirschkop won't say what he has received in legal fees from the Scientologists, but the church is a pros-

Although government lawyers, led by chief prosecutor Raymond Banoun, protested vigorously, arguing that the Scientologists were using their own possibly illegal activities to disqualify the judge, Hart granted the recusal motion and stepped down. Hart denied that he was biased, but he agreed that the appearance of impartiality had been tainted by the Scientologists' surveillance operation against him. "I was afraid a jury would be prejudiced against the defendants because of their alleged threats against me," Hart said recently.

The case was assigned next to Judge Louis Oberdorfer, who in light of Judge Hart's recent experience asked for memoranda and oral arguments from both sides at the outset indicating potential grounds for disqualification. Government lawyers pointed out in their memo that Oberdorfer was formerly an assistant attorney general in charge of the tax division of the Justice Department, which had prosecuted a case that ended the tax-exempt status for the founding Church of Scientology in Los Angeles in 1969. Oberdorfer concluded that he had "personal knowledge of disputed evidentiary facts," and on February 5, 1979, he too stepped down.

Shortly afterward the case fell to Richey, 57, a 1971 Nixon appointee whose liberal record—especially in the area of defendants' rights—surprised early critics. The assignment initially pleased the Scientology defendants. In a pamphlet called "The Trial of the Scientology Nine," prepared by the Scientologists, Judge Richey was described as having "a very fatherly visage... though crippled with a congenital defect in his hip, one does not notice either his limp or his shortness. His glasses glinting from the lights of the courtroom add to the picture of a man of deep intelligence and sympathy." And when Richey, too, asked at the outset for a recusal motion if one were planned, Boudin and Hirschkop said they were satisfied with his assignment to the case. That attitude was soon belied by a campaign of harassment that took place in and out of the courtroom.

During the summer of 1979, court sessions were held for about three weeks in Los Angeles, where Richey scheduled testimony on the Scientologists' motion to suppress evidence seized by the FBI in its 1977 raids of the church's headquarters. The thousands of documents seized in those raids constituted the core of the evidence against the alleged conspirators. The hearings had been moved in Los Angeles to accommodate the Scientologists' witnesses.

Prior to his departure for Los Angeles, Richey received several death threats. The judge has never publicly alleged that those threats came from Scientologists, but he said they were unrelated to the case. But he flew to California escorted by two federal marshals, and elaborate security precautions were implemented at the federal courthouse in downtown Los Angeles.

During the hearings, defendants repeatedly interrupted the proceedings with objections, motions and such com-

THE SCIENTOLOGISTS' LEGAL STRATEGY HAS BEEN TO FORCE THE RECUSAL OF EVERY JUDGE ASSIGNED TO THE CONSPIRACY CASE.

went far beyond legal surveillance. Members of the church were caught breaking into the offices of the IRS and the Justice Department, stealing and copying documents and eavesdropping. On August 15, 1978, 11 Scientologists were indicted on charges of electronically intercepting oral IRS communications, forging government passes, illegally entering government buildings, recruiting Scientologists to infiltrate the government, stealing records belonging to the IRS, Justice Department and the U.S. Attorney and conspiring to illegally obtain documents in the possession of the United States and to obstruct justice.

The Scientologist defendants hired some well-known defense counsel. Mary Sue Hubbard, the wife of church leader L. Ron Hubbard and the highest ranking defendant on trial, retained Leonard Boudin of Ratinowitz, Boudin & Steward and Michael Hertzberg, a solo practitioner, both activist lawyers now practicing law in New York City. Two other defendants, Henning Heldt and Duke Snider, retained Alexandria, Virginia, lawyer Philip Hirschkop, who had been counsel for the "D.C. Nine," and war protesters arrested in 1970. In all, 12 lawyers were hired to defend the defendants (two others had fled to England where they faced extradition proceedings). Hertzberg and Hirschkop soon assumed the leading roles in the defense.

Boudin and Hirschkop won't discuss why they were selected, but their public identification with radical and unpopular causes was undoubtedly attractive to

perous client. In one instance a member paid the church \$30,000 for the required series of counseling sessions.

Whatever their reasons for taking the case, high-minded principles have not characterized the campaign of the Scientologists' lawyers against the District of Columbia judges. In August 1978 the cases were assigned to Judge Hart, the judge whose comment had originally intensified the intelligence operation and who, like all of his fellow D.C. district court judges, had been investigated. He became the first victim of the Scientologists' recusal strategy.

Boudin filed the first recusal motion in January 1979. His theory was a novel one: by telling Judge Hart that the judge himself was a target of the Scientologists' own possibly illegal activities, he would cause the judge to be biased, or appear to be biased, against them. In his motion, Boudin quoted a Scientology document ordering an "overt" and "covert" data collection operation against Judge Hart, which, in Boudin's words, "possibly [included] the use of methods violative of the judge's privacy and other rights and possibly violative of the criminal laws." Boudin concluded that "the sitting judge is revealed to the jury and the public as a victim of possibly illegal actions," and "the judge has an obvious interest which may be affected by the outcome of the case." Notwithstanding documents to which government and defense counsel had access ordering similar operations on all the District of Columbia district court judges, Boudin declared that he knew of no other such campaigns.



The four targets of the Scientologists' litigation strategy (left to right): Aubrey Robinson, Charles Richey, Louis Oberdorfer and George Hart, Jr.

mentary, including insults to the judge. For example, Hirschkop and other counsel repeatedly and loudly ordered co-counsel to place adverse evidentiary rulings in a mythical "error bag." On several occasions, Hirschkop accused Richey of lying. At times, Richey left the bench and walked out rather than hold defense counsel in contempt. Only once, at a later hearing, did the judge seem to boil over: speaking to Hirschkop, Richey said, "I want to tell you right here and now, I resent it because I have done nothing to hurt you or your clients. And this record is replete with insults and everything else, when I have not done it to you and don't intend to." Banoun, the prosecutor, says Richey was too accommodating. "He should never have tolerated such behavior," Banoun says.

Hirschkop claims that he was the one who was insulted. "Richey showed contempt for me," Hirschkop says, recalling the time when, he claims, Richey tried to "force-feed" him French fries in court. (Banoun says the judge simply offered all the counsel some French fries he had not finished at lunch.) "I called Banoun a liar," Hirschkop continues, "and the

judge admonished me. But Banoun could insult me with impunity." Banoun denies that this was true. Hirschkop concedes that he frequently became "heated" in his dealings with Judge Richey but says, "I never called him dirty names."

In September 1979, after the Los Angeles hearings, Richey denied the Scientologists' motion to suppress the evidence seized by the FBI. The defendants eventually entered into a stipulation of facts, which amounted to an admission of the principal charges against them, and waived a jury trial. In return, the government agreed to drop 23 of its 24 criminal counts.

Judge Richey explicitly warned the Scientologists that the stipulation was likely to result in their conviction; he subsequently conducted his own review of the evidence, which he said was "overwhelming evidence of guilt," and on October 26, he convicted all nine. On December 6, two days before they were to be sentenced, a recusal motion against Richey was filed.

In this recusal motion, Boudin and Hirschkop again took the extraordinary position that Richey's response to their courtroom tactics and to the threats

showed that Richey was prejudiced against Scientologists. For example, without saying that the death threats were made by Scientologists, Hirschkop said that "upon information and belief, the security in Los Angeles was related to the court's apprehension with regard to the defendants in this case or their church," adding that "it is impossible to imagine a stronger—or more clearly 'extra-judicial'—source of bias than fear for one's life or well-being."

Whatever its merits, the recusal motion was patently defective in at least two technical respects. The judicial recusal statute requires a "timely" motion supported by an affidavit signed by a "party." This motion was filed four months after the events complained of—and after nearly 120 defense motions had been resolved against the Scientologists—and was supported by Hirschkop's affidavit, not one of the defendants'. ("I should have filed it much sooner," Hirschkop concedes. "Richey was grossly prejudiced from the start.") In response to the motion, Judge Richey defended his security precautions, noting that "the court may accept reasonable security precautions without risk of tainting

its rulings in the case." He denied the motion and that same day sentenced the nine defendants to prison terms of from six months to four to five years. Eight pulled out checks for \$10,000 the day of their sentencing, and all nine are now free on bail pending appeal.

The denial of their first recusal motion and the sentences, which the Scientologists regarded as unconscionably harsh, led to a redoubling of defense efforts to drive Richey from the case. Six months later, in June 1980, defense counsel were ready with another recusal motion, more damaging and threatening to Judge Richey than the first. The groundwork for that motion had been laid nearly a year before, shortly after the Los Angeles hearings.

That summer, Thomas Downian, Judge Richey's official court reporter who accompanied him to Los Angeles, was approached by Hirschkop and after their return to Washington. In a sworn affidavit filed in response to the second recusal motion, Downian says Hirschkop wanted to know if the security precautions in Los Angeles resulted from Richey's fear of Scientologists. In the affidavit Downian wrote he denied that the judge was afraid

but confirmed that before leaving Washington, the judge and his wife and two sons had received two death threats.

Soon after this encounter, in December 1979, a Scientology lawyer hired Richard Bast, a private detective who had worked for Hirschkop several years before, to investigate Judge Richey's security precautions. Bast's fee: \$321,000 plus expenses. One of Bast's first steps was to infiltrate Richey's inner circle at the courthouse.

In the spring of 1980, a few months after the Scientologists' sentencing, Fred Cain, a Bast employee and retired police officer, approached James Perry, one of two U.S. marshals who had accompanied Richey to Los Angeles. Cain explained to Perry that he had been retained by a European industrialist whose daughter had committed suicide, allegedly as a result of her involvement with the Church of Scientology, and that his assignment was to uncover information that could be damaging to the church. According to Bast, Perry told Cain that he wanted to write a book on the Scientology case, and Bast offered him a \$2,000 advance. Bast says that Perry took the money, and they agreed to

work together.

The evening of May 23, Perry and Cain met Dourian, the court reporter, at his home in Washington. According to Dourian's affidavit, Cain introduced himself as a private investigator for International Investigations, Inc., Bast's detective agency, and told him the same story about the European industrialist.

Dourian says in his affidavit that he found the story improbable but that because his home had been burglarized and he had received threatening phone calls, which he suspected came from Scientologists, he was curious about what Cain and Perry were doing. According to the affidavit, Dourian met with Cain three more times, and each time he was questioned about Judge Richey. At a meeting at his home on May 31, 1980, Dourian says he realized that the conversation was being recorded. Cain had been drinking heavily, Dourian says, and as a result, the court reporter was able to slip a small tape recorder and three cassettes out of Cain's pocket. Dourian's last meeting with Cain was on June 19, when they met with Bast and then dined at a nearby Pizzeria. Again, Dourian was asked about Richey, and the con-

versation was recorded.

The recordings of Dourian, along with tape-recorded statements made by Perry and statements made by Hirschkop—all collected by Bast—formed the basis for the best recusal motion against Judge Richey. The motion, largely incorporating an earlier recusal motion filed by Hirschkop, was filed on June 20, 1980, as proceedings were beginning against the two defendants recently extradited from Great Britain. For some of the Scientologists' counsel, however, the recusal strategy had gone too far. There was apparently opposition within the ranks to these motions and the way they were prepared. One lawyer, Michael Nussbaum, who represented two of the defendants, didn't sign the papers and withdrew as trial counsel.

The affidavit in support of this motion was filed by Morris Budlong, one of the extradited defendants, after he listened to various tapes and spoke to Hirschkop. Among the prejudicial remarks that Budlong attributed to Judge Richey were: that Richey's death threats emanated from Scientologists; that Jim Jones and Scientologists were "all the same"; that it would be a "feather in his hat" to convict the Scientologists; and that Richey had told another judge that Scientologists were spreading rumors about him as part of a "plot" to discredit him.

A cryptic footnote to the affidavit declined to provide details of the alleged rumors about Richey, citing "respect for the court as an institution." But Hirschkop and other defense counsel knew the details of the plot Richey alluded to. They had gotten them from Bast, who says he had combed the Los Angeles area for information about Judge Richey's personal habits, interviewing motel and restaurant employees and making videotapes and recordings. The information not revealed in the motion was taken by Bast to political columnist Jack Anderson.

The central figure in Bast's story was a self-professed Los Angeles prostitute who worked the Brentwood Holiday Inn, the motel where Richey stayed during the Los Angeles hearings. In a video recording shown to Gary Cohn, a reporter for Anderson, the prostitute recalled "in titillating detail," according to Cohn, an encounter with Judge Richey at the motel and his procurement of her services. According to Cohn, Bast also showed results of lie detector tests conducted by Cain to demonstrate that the prostitute was telling the truth; a tape recording of Perry, the U.S. marshal, claiming Judge Richey said, "Let's go get a woman"; and a tape recording of Dourian, the court reporter, saying Richey "was always picking up girls."

Cohn says that he was initially skeptical of the story because he was aware that Bast was employed by the Scientologists. But he says he had often worked with Bast and trusted him. He says he considered but rejected the possibility that the prostitute was herself a Scientologist, planted to entrap the judge. Bast says only that his discovery of the prostitute was "accidental," that he paid her \$1,200, that she is not a Scientologist and that she is no longer streetwalking.

Cohn wrote the column, which later appeared under Anderson's by-line, focusing on Bast's investigation and Richey's procurement of a prostitute. Cohn adds that he is now "not happy" with the way the column was written. In his affidavit, Dourian, the court reporter, who has heard the tapes he stole from Cain's pocket, denies the remarks attributed to him.

Newspapers that subscribe to Anderson's column received the Judge Richey story around July 11, a week before its release date of July 18. Some of them balked at running it—the New York Daily News

decided not to publish it—and The Washington Post used it only after extensive negotiations with Cohn. Cohn says he never reached Richey for comment, and although Post editor Ben Bradlee says he is sure "we did call [Richey] about the column," no comment from Richey appeared in the Post's version, either.

On July 16, Richey issued his opinion. Evidently referring to the upcoming Anderson column, which Richey might have known about from reporters' calls and messages, Richey characterized the recusal motion as "this latest effort in the escalating attack on the court" and found the grounds for the motion to be "insufficient as a matter of law," resting only on "hearsay, rumor and gossip."

But, the judge continued, "defendants and their counsel have engaged in groundless and relentless attacks on this court. Their motive is transparent. It is an attempt to transform the trial . . . into a trial of this judge." Though he labeled the attempts to remove him a "classic example" of abuse of the recusal statutes, he wrote that "the time has come for the proceedings in this case to proceed on the merits with the attention of all directed at the real issues in this case." As a result, Richey withdrew from the case in a state of exhaustion and near-collapse, according to associates.

On July 18, Jack Anderson's column appeared in newspapers throughout the country. Five days later, Judge Richey was hospitalized with exhaustion and pulmonary embolisms. He has since declined all comment on the case, citing the code of judicial conduct.

Judge Richey's ordeal may not be over. Hirschkop vows that his campaign against the judge will continue, and he claims that the prostitute affair is "only the tip of the iceberg." Although Hirschkop declines to disclose details, he says if necessary he will expose additional damaging information uncovered by Bast.

Apart from the delays, the campaign against Judge Richey has had negligible legal impact on the proceedings against the Scientology defendants. Though an appeal is pending on a conventional search and seizure question, the convictions of the first nine stand. Trials of the remaining two defendants started in late October under Judge Robinson and are still in progress.

The activities of the Scientologists and their counsel in this case seem destined only to satisfy a commandment L. Ron Hubbard once wrote:

"THE DEFENSE of anything is UNTEACHABLE. The only way to defend anything is to ATTACK, and if you ever forget that, then you will lose every battle you are ever engaged in, whether it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. DO, yourself, much MORE CHARGING, and you will WIN." □

In its July 1980 issue the American Lawyer named Judge Charles Richey runner-up to the worst District of Columbia federal district court judge. The lawyer who most vehemently denounced Richey was one of the Scientologists' defense counsel, and this same lawyer also referred our reporter to other lawyers who have represented Church of Scientology defendants. The reporter, who has since left our staff, says he was unaware of Scientologists' efforts to discredit and recuse Judge Richey. Without the lawyer's vehement derogatory remarks and his referrals to other "sources," our reporter says he would not have named Richey in the survey.

BATTLES ON OTHER FRONTS

The Church of Scientology has been involved in almost constant litigation since its founding nearly 30 years ago. Besides periodic clashes with the government, the church has filed scores of suits against the media to inhibit the news coverage of its activities.

Among the more recent cases involving the church and the media:

► Fourteen libel suits have been filed against Pauline Cooper, New York freelance writer and author of the 1971 book, *The Scandal of Scientology*, and her publisher. Church documents seized in the 1977 Los Angeles raid and made public that year revealed "Operation Freakout," a campaign of harassment directed against Cooper that included death threats, obscene phone calls, phony letters about her sexual behavior and a forged bomb threat against the church that resulted in Cooper's indictment in 1973. The charges against Cooper were dropped in 1975. Cooper has now retaliated with a \$55-million suit against the church.

► A 1977 suit against the San Diego Union asked \$10,000 in damages for invasion of privacy from a reporter who had registered for a Scientology course in order to write a story about the church. The church offered to drop the suit if plans to publish the story were dropped, but after the story ran, the church increased its damage claim to \$900,000 and added charges of fraud and deceit against the paper. The case was dismissed on summary judgment.

► In 1976 the church sued the Clearwater Sun in Florida for \$1 million and threatened to sue the St. Petersburg Times for a series of articles on the church. Scientologists spread rumors linking Times officials to the CIA, the FBI and the Communist Party, and harassed reporters. The Sun countersued the church for abuse of process, and the Times sued for injunctive forcing the church's harassment of its reporters. The church subsequently dropped its suit against

the Sun and never followed through on its threat to sue the Times.

► In March 1979 the church sued two New York writers, Jim Siegelman and Flo Coaway, after they criticized Scientology on the "David Susskind Show" while discussing their book *Snapping*. After the Scientologists' suit against them was dismissed, the pair countersued, charging the church with malicious prosecution.

The church has lately found itself on the defensive in a flurry of suits filed against it by disgruntled former church members and recruits. Currently pending against the church are:

► a suit filed October 21 by Lawrence Stifter, a Boston marathon runner, asking \$1.25 million for damages sustained after he was allegedly physically attacked by a Scientology recruiter. Stifter says that, due to the injury, he may never run again;

► a \$16-million suit filed in April by Tonja Burden, a 20-year-old former church member who claims she was deceived and forced to remain in the church, used as slave labor and kidnapped after she escaped;

► a \$21-million suit brought by jazz guitarist Gabor Szabo in February, accusing the church of embezzlement, kidnapping and forcing him to undergo a "life repair course";

► a class action filed last December by former church staff member Lavenda Van Schaick, seeking \$200 million on behalf of church dropouts. Her suit accuses the church of mind control, unlawful electronic surveillance and leaking details of her private life to the media.

Last year, Julie Tichbourne, a former Church of Scientology member, was awarded \$2 million by a Portland, Oregon, jury, which found that the church's promises of a better life were fraudulent. The church has subsequently filed four "deprogramming" for \$2 million collectively, claiming that they induced Tichbourne to turn against the church.

—J.R.S.

LEVEL 1 - 18 CASES

1. CHURCH OF SCIENTOLOGY OF ARIZONA, an Arizona Corporation, Appellant, v. CITY OF PHOENIX POLICE DEPARTMENT, a municipal agency; LAWRENCE M. WETZEL, Chief of Police; JOHN DOES I-X, Appellees., No. 1 CA-CIV 3825, Court of Appeals of Arizona, DIVISION ONE, DEPARTMENT B, 122 Ariz.(App.) 338; 594 P.2d 1034, April 26, 1979
2. LOS ANGELES POLICE DEPARTMENT et al., Petitioners, v. THE SUPERIOR COURT OF LOS ANGELES COUNTY, Respondent; CHURCH OF SCIENTOLOGY OF CALIFORNIA, Real Party in Interest., Second Dist., Div. Two, 65 C.A.3d 661, Jan. 5, 1977; as modified Feb. 2, 1977 on denial of petition for rehearing. Hg. den. Apr. 26, 1977
3. L. GENE ALLARD, Plaintiff, Cross-defendant and Respondent, v. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Defendant, Cross-complainant and Appellant., Second Dist., Div. Two, 58 C.A.3d 439, May 18, 1976
4. Gabriel CAZARES and Margaret Cazares, Petitioners, v. THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC., Merrell Vannier, Francine Vannier, Clyde H. Wilson, Jr., Wilson, Wilson & Namack, Chartered, Tobias Tolzman, Mary Sue Hubbard, L. Ron Hubbard, and Joseph Lisa, Respondents., No. 82-1059., District Court of Appeal of Florida, Fifth District., 429 So.2d 348, March 9, 1983; Rehearing Denied April 14, 1983.

LEVEL 1 - 18 CASES

5. THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC., and MARY SUE HUBBARD, Appellants, v. GABRIEL CAZARES and MARGARET CAZARES, his wife, Appellees., NO. 80-1438, District Court of Appeal of Florida, Second District, 401 So.2d 810, April 1, 1984.
6. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Appellant, v. RONALD SCHULTZ, as Pinellas County Property Appraiser, and O. SANFORD JASPER, as Pinellas County Tax Collector, Appellees., No. 78-1310, District Court of Appeal of Florida Second District, 371 So.2d 502, May 9, 1979.
7. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a California corporation, and SOUTHERN LAND DEVELOPMENT & LEASING CORPORATION, a Delaware corporation, Appellants/Cross-Appellees, v. PAUL M. WADE and SOPHIE G. WADE, his wife, et al., Appellees/Cross-Appellants.. NO. 77-578, District Court of Appeal of Florida Second District, 358 So.2d 885, May 17, 1978.
8. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D. C., Plaintiff-Appellant, v. AMERICAN MEDICAL ASSOCIATION et al., Defendants-Appellees., First District (3rd Division), 60 Ill. App. 3d 586, May 17, 1978.
9. THE CHURCH OF SCIENTOLOGY OF BOSTON, INC. vs. DISTRICT ATTORNEY FOR THE SUFFOLK DISTRICT, Appeals Court of Massachusetts, 9 Mass. App. Ct. 849,

LEVEL 1 - 18 CASES

21, 1980

10. The CHURCH OF SCIENTOLOGY OF MINNESOTA, Appellant, v. MINNESOTA STATE MEDICAL ASSOCIATION FOUNDATION, et al., Respondents, John LaBree, etc., et al., Defendants, American Medical Association, Respondent., No. 47457., Supreme Court of Minnesota, en banc, 264 N.W.2d 152, March 17, 1978.

11. Missouri Church of Scientology, Plaintiff-Appellant, vs. State Tax Commission of Missouri, J. E. Riney, Don G. Williams, Robert F. Love, Commissioners of State Tax Commission of Missouri, John K. Travers, Collector of Revenue, City of St. Louis, and Glenn J. McBrady, Assessor, City of St. Louis, Defendants-Respondents., Supreme Court of Missouri En Banc, 560 S.W.2d 837 Motion History: 02/08/78 Rehearing Overruled, 12/19/77

12. The Missouri Church of Scientology, Plaintiff-Appellant, vs. James E. Adams, Elaine Viets and Pulitzer Publishing Company, Defendants-Respondents., Supreme Court of Missouri En Banc, 543 S.W.2d 776 Motion History: NONE FILED, 12/13/76

13. Church of Scientology of New York, Respondent, v State of New York et al., Appellants. Church of Scientology of New York, Respondent, v State of New York et al., Appellants., 46 N Y 2d 906, February 15, 1979

LEVEL 1 - 18 CASES

14. Church of Scientology of New York, Respondent, v State of New York et al., Appellants. Church of Scientology of New York, Respondent, v State of New York et al., Appellants., 61 A D 2d 942, First Department, March 23, 1978

15. Christofferson v. Church of Scientology, (No. 15952), Supreme Court of Oregon, 293 Or. 456, 650 P.2d 928, August 3, 1982, Filed

16. Christofferson v. Church of Scientology, (No. 15952), Supreme Court of Oregon, 293 Or. 456, 650 P.2d 928, August 3, 1982, Filed

17. Marks v. Rudie et al/State ex rel Rudie et al v. Church of Scientology of Portland et al, (No. A20440), Court of Appeals of Oregon, 59 Or.App. 409, 650 P.2d 191, September 15, 1982, Filed

18. Julie Christofferson, Respondent, v. Church of Scientology of Portland, an Oregon nonprofit corporation, Church of Scientology, Mission of Davis, a nonprofit California corporation doing business in Oregon, Delphian Foundation, an Oregon nonprofit corporation, and Martin Samuels, Appellants., No. A7704-05184, CA 15952, Court of Appeals of Oregon, 57 Or.App. 203, 644 P.2d 577, May 3, 1982, Filed; Argued and submitted September 3, 1981

LEVEL 1 - 79 CASES

1. CHRISTOFFERSON, JULIE V. CHURCH OF SCIENTOLOGY, 82-1036, SUPREME COURT OF THE UNITED STATES, 51 U.S.L.W. 3611, February 22, 1983
2. CHURCH OF SCIENTOLOGY V. CHRISTOFFERSON, JULIE, 82-1025, SUPREME COURT OF THE UNITED STATES, 51 U.S.L.W. 3613, February 22, 1983
3. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC. V. REGAN, SECRETARY OF THE TREASURY, ET AL., No. 81-1812., SUPREME COURT OF THE UNITED STATES, 456 U.S. 976; 50 U.S.L.W. 3916, May 17, 1982
4. FOUNDING CHURCH OF SCIENTOLOGY V. UNITED STATES., No. 81-1275., SUPREME COURT OF THE UNITED STATES, 456 U.S. 926; 50 U.S.L.W. 3838, April 19, 1982
5. CHURCH OF SCIENTOLOGY OF CALIFORNIA V. FOLEY ET AL., No. 80-1693., SUPREME COURT OF THE UNITED STATES, 452 U.S. 961; 49 U.S.L.W. 3954, June 22, 1981
6. CHURCH OF SCIENTOLOGY OF CALIFORNIA V. UNITED STATES., No. 79-529., SUPREME COURT OF THE UNITED STATES, 444 U.S. 1043, January 21, 1980
7. No. 78-1166. CHURCH OF SCIENTOLOGY OF CALIFORNIA ET AL. V. BLUMENTHAL, SECRETARY OF THE TREASURY, ET AL., Supreme Court of the United States, 441 U.S. 938, May 14, 1979

LEVEL 1 - 79 CASES

8. No. 77-1568. MISSOURI CHURCH OF SCIENTOLOGY V. STATE TAX COMMISSION OF MISSOURI ET AL., SUPREME COURT OF THE UNITED STATES, 439 U.S. 803, October 2, 1978
9. No. 77-1090. FOUNDING CHURCH OF SCIENTOLOGY V. UNITED STATES., SUPREME COURT OF THE UNITED STATES, 435 U.S. 925, March 20, 1978
10. No. 76-523. CHURCH OF SCIENTOLOGY OF CALIFORNIA V. ALLARD., SUPREME COURT OF THE UNITED STATES, 429 U.S. 1091, February 22, 1977
11. No. 51, Orig. FOUNDING CHURCH OF SCIENTOLOGY V. CROMER ET AL., 404 U.S. 933 Nov. 9, 1971.
12. No. 1175. FOUNDING CHURCH OF SCIENTOLOGY V. UNITED STATES., 397 U.S. 1009, Mar. 30, 1970.
13. No. 598. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., ET AL. V. UNITED STATES., 396 U.S. 963, Dec. 8, 1969.
14. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a non-profit corporation, Plaintiff-Appellant, v. UNITED STATES POSTAL SERVICE, Benjamin Bailer, Postmaster General, Postal Inspector Service, William J. Cotter, Chief

LEVEL 1 - 79 CASES

Inspector, Defendant-Appellees., No. 81-5582., UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT., 700 F.2d 486, February 4, 1983; As Amended on Denial of Rehearing March 31, 1983.

15. UNITED STATES OF AMERICA v. MARY SUE HUBBARD, ET AL. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT, No. 82-1693, UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT, 686 F.2d 955, August 10, 1982

16. UNITED STATES OF AMERICA v. MARY SUE HUBBARD, ET AL. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT, No. 82-1693, UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT, Slip Opinion, August 10, 1982

17. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC. v. DONALD T. REGAN, Secretary of the Treasure, et al., No. 80-1546, UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT, 670 F.2d 1158, December 31, 1981

18. IN RE: SEARCH WARRANT DATED JULY 4, 1977, FOR PREMISES AT 2125 S STREET, NORTHWEST, WASHINGTON, D.C. UNITED STATES, APPELLANT; IN RE: SEARCH WARRANT DATED July 4, 1977, FOR PREMISES AT 2125 S STREET, NORTHWEST, WASHINGTON, D.C. FOUNDING CHURCH OF SCIENTOLOGY, APPELLANT, No. 79-2138; No. 79-2176, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 667 F.2d 117, October 2, 1981; As Amended

LEVEL 1 - 79 CASES

19. Church of Scientology of CA, Inc. v. The U.S. Dept. of Justice, Etc., Et Al. No. 80-5120, UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT, Unit B, 647 F.2d 1119, May 12, 1981

20. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT v. PATRICIA R. HARRIS, ET AL. No. 80-1189, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT 653 F.2d 584, April 17, 1981

21. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., APPELLANT v. NATIONAL SECURITY AGENCY, ET AL., No. 80-1848, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, Slip Opinion, March 24, 1981

22. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff-Appellant, v. Gabriel CAZARES, Defendant-Appellee., Nos. 78-3100, 79-1840., United States Court of Appeals for the Fifth Circuit., 638 F.2d 1272, March 9, 1981.

23. UNITED STATES OF AMERICA v. MARY SUE HUBBARD, ET AL., APPELLANTS; UNITED STATES OF AMERICA v. MARRY SUE HUBBARD, ET AL. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT; CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT v. UNITED STATES OF AMERICA, ET AL., No. 79-2312; No. 79-2313; No. 79-2324, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, Slip Opinion, February 9, 1981

LEVEL 1 - 79 CASES

24. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT v. SHIRLEY FOLEY et al., No. 77-2134, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 640 F.2d 1335, January 8, 1981

25. CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC., APPELLANT v. STANSFIELD TURNER, Director, Central Intelligence Agency, ET AL., No. 80-1172, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 662 F.2d 784, December 18, 1980

26. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff-Appellant, v. UNITED STATES POSTAL SERVICE, et al., Defendant-Appellees., No. 79-3655 CV 75-2004-R, UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT, 633 F.2d 1327, December 15, 1980

27. UNITED STATES of America v. Mary Sue HUBBARD et al., Appellants; UNITED STATES of America v. Mary Sue HUBBARD et al.; Church of Scientology of California, Appellant.; CHURCH OF SCIENTOLOGY OF CALIFORNIA, Appellant, v. UNITED STATES of America et al., Nos. 79-2312, 79-2313 and 79-2324., United States Court of Appeals, District of Columbia Circuit., 650 F.2d 293, July 24, 1980.

28. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a Non-Profit Corporation, under the laws of California, Plaintiff-Appellant, v. John McLEAN and Nancy McLean, Defendants-Appellees., No. 79-2629 Summary Calendar. * * Fed.R.App.P. 34(a);

LEVEL 1 - 79 CASES

Cir. R. 18., United States Court of Appeals, Fifth Circuit., 615 F.2d 691, April 18, 1980; As Amended

29. CHURCH OF SCIENTOLOGY OF CALIFORNIA, APPELLANT v. SHIRLEY FOLEY, et al., No. 77-2134, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 640 F.2d 1335, February 20, 1980

30. CHURCH OF SCIENTOLOGY OF CALIFORNIA, A non-rpofit corporation, Appellant, v. UNITED STATES DEPARTMENT OF JUSTICE, William B. Saxbe, Attorney General of the United States; DRUG ENFORCEMENT ADMINISTRATION, Appellees., No. 76-2506, UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT, 612 F.2d 417, November 8, 1979

31. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a nonprofit corporation, Plaintiff-Appellant, v. UNITED STATES DEPARTMENT OF the ARMY: Howard H. Callaway, Secretary of the Army; U.S. Intelligence Agency; Major Aaron, Assistant Chief of Staff for Army Intelligence, Defendants-Appellees; CHURCH OF SCIENTOLOGY OF CALIFORNIA, a nonprofit corporation, Plaintiff-Appellant, v. UNITED STATES DEPARTMENT OF DEFENSE; Office of the Secretary of Defense; James R. Schlesinger, Secretary of the Department of Defense; United States Department of the Navy; J. Wm. Middendorf II, Secretary of the Navy; Naval Intelligence Command: Rear Admiral E.F. Rectanus, Director of Naval Intelligence, Defendants-Appellees., Nos. 78-1168, 78-1169., United States Court of Appeals,

LEVEL 1 - 79 CASES

Ninth Circuit., 607 F.2d 1282; 611 F.2d 738, November 7, 1979; Rehearing Denied April 7, 1980; Suggestion for Rehearing En Banc in No. 78-1169 Rejected April 7, 1980; As Amended April 24, 1980

32. THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., APPELLANT v. GRIFFIN B. BELL, et al., No. 78-1391, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 603 F.2d 945, June 25, 1979; As Amended

33. THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., APPELLANT v. NATIONAL SECURITY AGENCY, et al., No. 77-1975, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 610 F.2d 824, May 15, 1979

34. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a non-profit corporation, Plaintiff-Appellant, v. UNITED STATES POSTAL SERVICE, Benjamin Bailer, Postmaster General, Postal Inspection Service, William J. Cotter, Chief Inspector, Defendants-Appellees., No. 76-1610., United States Court of Appeals, Ninth Circuit., 593 F.2d 902, March 26, 1979.

35. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Petitioner-Appellant, v. UNITED STATES of America, Respondent-Appellee., No. 78-2434., United States Court of Appeals, Ninth Circuit., 591 F.2d 533, Feb. 22, 1979; As Amended

LEVEL 1 - 79 CASES

36. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a Nonprofit California Corporation, Plaintiff, v. James E. ADAMS, Elaine Viets, Pulitzer Publishing Co., Inc., et al., Defendants., No. 75-1954., United States Court of Appeals, Ninth Circuit., 584 F.2d 893, Oct. 23, 1978.

37. THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., APPELLANT v. HEINRICH BAUER VERLAG, ET AL., No. 74-1789, United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT, 536 F.2d 429, June 1, 1976

38. UNITED STATES OF AMERICA, and ROBERT H. CLUBERTON, Internal Revenue Agent, Internal Revenue Service, Petitioners-Appellees, vs. CHURCH OF SCIENTOLOGY OF CALIFORNIA and HENNING HELDT, Vice President, Respondents-Appellants., No. 74-1487, UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT, 520 F.2d 818; 21 FR Serv2d 833; 75-2 U.S.T.C. P9584, June 26, 1975

39. CHURCH OF SCIENTOLOGY OF HAWAII, Plaintiff-Appellee, vs. THE UNITED STATES OF AMERICA, Defendant-Appellant., No. 71-2761, UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT, 485 F.2d 313; 73-2 U.S.T.C. P9659; 32 AFTR 2d 74-5784, September 6, 1973

40. CHURCH OF SCIENTOLOGY OF MINNESOTA et al., Appellants, v. DEPARTMENT OF HEALTH, EDUCATION & WELFARE, etc., et al., Appellees., No. 71-1507., United

LEVEL 1 - 79 CASES

States Court of Appeals, Eighth Circuit., 459 F.2d 1044, May 3, 1972. Decided

41. The CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff-Appellant, v. Elliot RICHARDSON * et al., Defendants-Appellees. * Elliot Richardson has been substituted for his predecessor in office, Robert H. Finch, pursuant to Fed.R.Civ.P. 25(d) (1)., No. 24276., United States Court of Appeals, Ninth Circuit., 437 F.2d 214, Jan. 11, 1971.

42. The FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D. C., et al., Appellants, v. UNITED STATES of America, Appellee., No. 21483., United States Court of Appeals District of Columbia Circuit., 409 F.2d 1146, Feb. 5, 1969. Petition for Rehearing Denied April 18, 1969.

43. CHURCH OF SCIENTOLOGY OF CALIFORNIA and FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., Plaintiffs, against JAMES SIEGELMAN, FLO CONWAY, J.B. LIPPINCOTT COMPANY, and MORRIS DEUTSCH, Defendants., No. 79 Civ. 1166 (GLG), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, 94 F.R.D. 735; CCH Fed.Sec. P98,809; 34 FR Serv2d 1551, July 23, 1982

44. The Church of Scientology of Celebrity Centre, Los Angeles Steven Heard Catherine Ry; an Robert Graves Maxine Hansen Thomas Atkinson v Roscoe L. Egger, Jr. Meade Whittaker Barbara Bird Lewis J. Hubbard, Jr. Lawrence Glyvs John B.

LEVEL 1 - 79 CASES

King Mary Spates Joseph A. Tedesco John Hanlon Milton Lichtman, Civil Action No. 81-1952, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 539 F.Supp. 491; 82-1 U.S.T.C. P9386; 50 AFTR 2d 82-5072, May 20, 1982

45. LAVENDA VAN SCHAICK V. CHURCH OF SCIENTOLOGY OF CALIFORNIA, CHURCH OF SCIENTOLOGY OF NEVADA, MISSION OF MEADOWS OF LAS VEGAS, CHURCH OF SCIENTOLOGY OF CLEARWATER, FLORIDA; CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C.; SOUTHERN LAND DEVELOPMENT AND LEASING CORPORATION; CHURCH OF SCIENTOLOGY OF NEW YORK, NEW YORK; WORLD WIDE INSTITUTE OFF SCIENTOLOGY, INC.; AMERICAN CITIZENS FOR HONESTY IN GOVERNMENT, INC., L. RON HUBBARD, MARY SUE HUBBARD, HENNING HELDT, MITCHELL HERMANN, CINDY RAYMOND, DUKE SNIDER, SHARON THOMAS, RICHARD WEIGARD, GREGORY WILLARDSON, GERALD BENNETT WOLFE, PAMELA BEVAN, ROBERT HARVEY, PERRY PLATT, JACK GAY, BARBARA GLASS, NORMAN HAMILTON and JANE KEMBER, CIVIL ACTION No. 79-2491-G, UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS, 535 F.Supp. 1125, March 26, 1982

46. NANCY McLEAN and JOHN McLEAN, Her Son, Plaintiffs, vs. THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, et al., Defendants., Case No. 81-174 Civ T-K, UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, 538 F.Supp. 545, March 16, 1982

LEVEL 1 - 79 CASES

47. MIRA CHAIKIN, Plaintiff, against LAFAYETTE RON HUBBARD, CHURCH OF SCIENTOLOGY, MARY SUE HUBBARD, and CHICK COREA, Defendants., No. 81 Civ. 7525 (WCC), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, Slip Opinion, February 11, 1982

48. PAULETTE COOPER, Plaintiff v. CHURCH OF SCIENTOLOGY OF BOSTON, INC., CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC., L. RON HUBBARD, MARY SUE HUBBARD, and BOSTON SAFE DEPOSIT AND TRUST CO., Defendants, CIVIL ACTION No. 81-681-MC, UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS, 92 F.R.D. 783, January 27, 1982

49. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff, v. ELMER F. LINBERG, et al., Defendants., No. CV 77-2654-Kn, UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, 529 F.Supp. 945, December 11, 1981

50. TONJA BURDEN, Plaintiff vs. CHURCH OF SCIENTOLOGY OF CALIFORNIA, et al Defendants, Case No. 80-501-Civ-T-K, UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, 526 F.Supp. 44; 33 FR Serv2d 194, July 14, 1981

51. IN RE: CHURCH OF SCIENTOLOGY OF CALIFORNIA, etc., Plaintiff v. PAULETTE COOPER, Defendant, No. CV 79 2053 (RMT), and PAULETTE COOPER, Counterclaimant v. CHURCH OF SCIENTOLOGY OF CALIFORNIA, etc. Counterdefendant, No. CV 79 2053 (RMT)., No. M-8-85, UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LEVEL 1 - 79 CASES

90 F.R.D. 442, June 10, 1981

52. The FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C. INC., Plaintiff, v. UNITED STATES MARSHALS SERVICE, et al., Defendants., Civ. A. No. 80-1479., United States District Court, District of Columbia., 516 F.Supp. 151, December 31, 1980.

53. CHURCH OF SCIENTOLOGY OF COLORADO Plaintiff, v. UNITED STATES OF AMERICA, Defendant., Civil Action No. 79-C-1515, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO, 499 F.Supp. 1085; 81-1 U.S.T.C. P9236; 47 AFTR 2d 81-383, October 24, 1980

54. CHURCH OF SCIENTOLOGY OF CALIFORNIA and FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., Plaintiffs, against JAMES SIEGELMAN, FLO CONWAY, J.B. LIPPINCOTT COMPANY and MORRIS DEUTSCH, Defendants., No. 79 Civ. 1166 (GLG), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, Slip Opinion, September 17, 1980

55. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff, v. DEPARTMENT OF STATE et al., Defendants., Civ. A. No. 77-1320., United States District Court, District of Columbia., 493 F.Supp. 418, June 19, 1980.

LEVEL 1 - 79 CASES

56. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a corporation, Plaintiff, v. PAULETTE COOPER, Defendant., No. CV 78-2053-AAH (PX), UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, 495 F.Supp. 455, June 18, 1980

57. CHURCH OF SCIENTOLOGY OF CALIFORNIA and FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., Plaintiffs, against JAMES SIEGELMAN, FLO CONWAY, J.B. LIPPINCOTT COMPANY and MORRIS DEUTSCH, Defendants., No. 79 Civ. 1166(GLG), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, 86 F.R.D. 553; 31 FR Serv2d 175, May 30, 1980

58. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., Plaintiff v NATIONAL SECURITY AGENCY, et al., Defendants, Civil Action No. 76-1494, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 489 F.Supp. 951, May 19, 1980

59. The FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., Plaintiff, v. G. William MILLER et al., Defendants., Civ. A. No. 75-1471., United States District Court, District of Columbia., 490 F.Supp. 144, April 17, 1980; On Motion for Reconsideration May 13, 1980.

60. THE CHURCH OF SCIENTOLOGY OF NEW YORK, Plaintiff, against FEDERAL BUREAU OF INVESTIGATION and UNITED STATES DEPARTMENT OF JUSTICE, Defendants., No. 79

LEVEL 1 - 79 CASES

3620-CSH, UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, Slip Opinion, January 31, 1980

61. CHURCH OF SCIENTOLOGY OF CALIFORNIA, PLAINTIFF v. Griffin BELL, ET AL., DEFENDANTS., Civil Action No. 76-1006., United States District Court, District of Columbia., 80-1 U.S.T.C. P9413; 45 AFTR 2d 80-1090, January 30, 1980. = = =

62. CHURCH OF SCIENTOLOGY OF CALIFORNIA and FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., Plaintiffs, against JAMES SIEGELMAN, FLO CONWAY, J. B. LIPPINCOTT COMPANY and MORRIS DEUTSCH, Defendants., 79 Civ. 1166 (GLG), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, 481 F.Supp. 866, December 19, 1979

63. CHURCH OF SCIENTOLOGY OF CALIFORNIA and FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., Plaintiffs, against JAMES SIEGELMAN, FLO CONWAY, J. B. LIPPINCOTT COMPANY and MORRIS DEUTSCH, Defendants., 79 Civ. 1166 (GLG), UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, 475 F.Supp. 950, August 27, 1979

64. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., Plaintiff, v. DIRECTOR, FEDERAL BUREAU OF INVESTIGATION, et al., Defendants., C.A. No. 78-0107 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 459 F.Supp. 748; 26

LEVEL 1 - 79 CASES

FR Serv2d 933, Oct. 19, 1978

65. CHURCH OF SCIENTOLOGY OF CALIFORNIA, on its own behalf and on behalf of its members, et al., Plaintiffs, v. WILLIAM SIMON, Secretary of the Treasury, et al., Defendants., CASE NO. CV 76-2160-WPG, UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, 460 F.Supp. 56, October 13, 1978

66. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff, v. Gabriel CAZARES, Defendant., No. 76-86 Civ. T-K., United States District Court, Middle District Florida, Tampa Division., 455 F.Supp. 420, Aug. 15, 1978. * * Actually signed by Judge Krentzman on August 4, 1978 but filed later.

67. THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., Plaintiff, v. CLARENCE M. KELLEY, et al., Defendants., Civil Action 77-0175, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 77 F.R.D. 378; 24 FR Serv2d 1268, Nov. 29, 1977

68. THE FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, D.C., INC., Plaintiff, v. F. RAY MARSHALL, et al., Defendants., Civil Action No. 76-1131, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 439 F.Supp. 1267, Nov. 8, 1977

LEVEL 1 - 79 CASES

69. FOUNDING CHURCH OF SCIENTOLOGY OF WASHINGTON, INC., Plaintiff v NATIONAL SECURITY AGENCY, et al., Defendants, Civil Action No. 76-1494, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 434 F.Supp. 632, July 21, 1977

70. CHURCH OF SCIENTOLOGY OF CALIFORNIA, Plaintiff v WILLIAM E. SIMON, et al., Defendants, Civil Action No. 76-1719, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, 433 F.Supp. 1107, July 15, 1977

71. CHURCH OF SCIENTOLOGY OF CALIFORNIA, a Nonprofit Corporation, Plaintiff, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants., No. CV 74-3550-F., United States District Court, C.D. California., 410 F.Supp. 1297, April 2, 1976.

72. Church of Scientology of Hawaii, Plaintiff v. United States of America, Defendant., Civil No. 70-3138., United States Court, District of Hawaii., 75-2 U.S.T.C. P9651; 36 AFTR 2d 75-5710, 8/4/75.

73. Church of Scientology of California, a non-profit corporation, Plaintiff v. Internal Revenue Service, Donald C. Alexander, Commissioner of Internal Revenue, Department of the Treasury of the United States, William Simon, Secretary of the Treasury of the United States, Defendants., No. CV74-3465-RJK., United States District Court, Cent. Dist. Calif., 75-1 U.S.T.C. P9197; 35 AFTR 2d 75-643,

LEVEL 1 - 79 CASES

12/12/74.

74. United States of America and Robert H. Cluberton, Internal Revenue Agent, Internal Revenue Service, Petitioners v. Church of Scientology of California and Henning Heldt, Vice President, Respondents., No. 73-2100-HP, U.S. District Court, Cent. Dist. Calif., 74-1 U.S.T.C. P9107, 11/15/73.

75. The CHURCH OF SCIENTOLOGY OF CALIFORNIA a religious corporation, and Reverend Robert H. Thomas, Plaintiffs, v. DELL PUBLISHING CO., INC., a New York corporation, and George Malko, Defendants., No. C-70-2089., United States District Court, N.D. California., 362 F. Supp. 767, Aug. 3, 1973. As Corrected Sept. 17, 1973.

76. CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC., Plaintiff, v. Bernard GREEN and Barbara Green, Defendants., No. 69 Civ. 5745., United States District Court, S.D. New York., 354 F.Supp. 800, Feb. 9, 1973.

77. UNITED STATES of America, Libelant, v. An ARTICLE OR DEVICE ... "HUBBARD ELECTROMETER" or "Hubbard E-Meter," etc., Founding Church of Scientology et al., Claimants., No. D.C. 1-63., United States District Court, District of Columbia., 333 F. Supp. 357, July 30, 1971.

LEVEL 1 - 79 CASES

78. CHURCH OF SCIENTOLOGY OF MINNESOTA et al., Plaintiffs, v. DEPARTMENT OF HEALTH, EDUCATION AND WELFARE et al., Defendants., No. 4-69 Civ. 86., United States District Court, D. Minnesota, Fourth Division., 341 F. Supp. 563, July 20, 1971.

79. ~~THE FOUNDING CHURCH OF SCIENTOLOGY v. THE UNITED STATES~~, No. 266-61, United States Court of Claims, 188 Ct. Cl. 490; 412 F.2d 1197, July 16, 1969

CIC & MARK SHEET

NO. _____

SUBJECT: FLYNN, MICHAEL J. ATTY E US

CATEGORY

1. Shaifer, Bronson	E US
2. Flynn, Kevin	E US
3. Swartz, Ford	T US
4. Keohn, Ray	T US
5. Wolfe, Mr. Lotlo	E US
6. Dept. of the Atty General Mass.	E US
7. Harman, Abbie	E US
8. Flanagan, Joe	T US
9. Keough, Bob	E US
10. Sylvester, Roger	D US
11. Hetherington, Judith	E US
12. US Attys Office DC	E US
13. Cath, Stanley	E US
14. Cooper, Paulette	E US
15. City of Clearwater	E US
16. Greene, Thomas	E US
17. Flynn finances	E US
18. Garritano, Silvana	T US
19. Van Schaick, LaVenda	T US
20. Burdon, Tonja	T US
21. Ryan Smith and Cochran	E US
22. Flynn Associates Management Corp.	E US
23. Herron, Stan	T US
24. Baptista, Jose	T US
25. Navins, Peter	E US
26. Boston Globe	E US
27. Logan, Walt	E US
28. General Counsel Office Jacksonville, FL	E US
29. Naval Justice School Newport R.I.	E US
30. Han McLean	T US
31. Wolff, David	E US
32. Rheingold, Paul	E US
33. McMichael, John	E US
34. Clar, Mr. Doug	E US
35. Cour d'Alone Press	E US
36. Narconnon	E US

18 Aug '81

The US Attornies Office contacted Flynn. (1,1)

Flynn got a retainer of \$5,000 from the city of Clearwater. (1,2)

The city of Clearwater express mailed an 8lb package to Flynn. (4,1)

Flynn is running a legal notice on LRH for 21 straiht days in the Globe. (4,2)

Miss Heatherton of the US Attys Office is advising Flynn. (4,3)

Hoffman is in comm with Heatherton. (4,4)

Flynn tells atty Logan in Fla. that he can draft a motion for substitute service similar to the one he did for Cooper. (5,1)

Flynn wants to get Mary Sue's address. (5,2)

Flynn's office has put together a preliminary report for the City Commission of Clearwater. (7,1)

A Motion to advance is being filed on the Stifler suit. (7,2)

Flynn has sent three motions to Logan. (8,1)

Flynn is in disagreement with the bill sent to him by Stanley Cath. (9,1)

A full copy of the Flynn office report to the city of Clearwater. (pages 10-20 23-25) Covers the city's rights regarding tax exemptions, zoning, history of Scn., comercial and religious motivation, and the cities ability to act on these issues.

A biography has been typed in Flynn's office on LRH. (pgs 21 and 22)

Kevin Flynn wrote a letter to Doug Clark of Coeur d'Alene press in Coeur d'Alene Idaho about the criminality of Scn. (pgs 26 & 27)

13984

GUARDIAN ORDER

GO 314

9 September 1974

Info Bureau only

CONFIDENTIAL
INTELLIGENCE COURSE

NAME _____

ORG _____

POST _____

PRE-REQUISITE: GO Basic Data Checksheet

SEQUENCE: This checksheet is done once through, with study tech. fully applied. Stars are noted with an asterisk (*) This checksheet consists of 5 sections with an internship in the Info Bureau after each one.

SECTION 1 - GENERAL INFORMATION

Date started _____ Date completed _____

BRIEFING: 1) Get a briefing from Director of Collections on security, keys, phones, times, offices, staff, comm center, files, books, equipment, hats, etc. _____

2) Read Briefing Sheet to BI staff _____

3) For your info re: BI Library _____

BOOKS: To be read in student's own time

- 1) Brainwashing _____
2) Hidden Story of Scientology _____
3) Part 1 South African Submission (to be read in office space) _____

PART A - THE INFORMATION BUREAU

1. Get the definitions of the following words, use them in sentences until you have them conceptually. Look them up in several different dictionaries.

Spy	Espionage	C.I.A.
Spying	Counter Espionage	F.B.I.
Agent	Counter Intelligence	M.I.6.
Operative	Fascism	M.I.5.
Information	Socialism	K.G.B.
Intelligence	Communism	G.R.U.

2. Essays: The differences and similarities of Intelligence, Counter Intelligence, Information, Spying, Espionage and Counter Espionage. _____

3. Pl 1 March 66 The Guardian (Intelligence section) ✓ _____



4. Clay demo: Intelligence
5. PL 25 Sept 73, Organisation of the G.O. (Info Bur)
6. Clay demo- Information Bureau Org Board
7. PL 20 Feb 72 Intelligence and Security
8. Essay: What could happen if Intelligence was not anonymous and/or elusive
9. MSH Write up: Duties of Intelligence Chief

M7

M4

10. _____
11. _____
12. _____
13. _____
14. _____
15. _____
16. _____
17. _____
18. _____
19. _____
20. _____
21. _____
22. _____
23. _____
24. _____

PART B - THE WLR

1. Info Ltr 13 Apr 61, Terror Stalks ✓
2. Info Ltr 8 May 61, Communism and Scientology ✓
3. Info Ltr 27 Oct 62, Ron's Journal ✓
4. Info Ltr 9 Nov 62, Ron's Journal No.2
5. Info Ltr 8 Jan 63, Ron's Journal No.3 ✓
6. Info Ltr 15 Jan 63, The DC Situation ✓
7. Info Ltr 4 June 63, Sobering Facts ✓
8. Info Ltr 24 Nov 63, Essential Information ✓
9. Exec Ltr 7 Apr 65, Ron's Journal No. 11
10. Exec Ltr 4 June 65, OCA graph of woman after RCT
11. Exec Ltr 4 Oct 65, Melbourne Inquiry into Scm.
12. Exec Ltr 10 Oct 65, Ron's Journal No.17.
13. Exec Ltr 3 Nov 65, US Suits ✓
14. Exec Ltr 29 Nov 65, Validity of vested interests
15. SecED 4 WW 9 Feb 66, Enquiry rumour UK

16. SecED 52 WW 11 Feb 66, Committee for Sane Psychiatry
17. Exec Ltr 21 Feb 66, The Calculated Risk ✓
18. SecED 61 WW 22 Feb 66, Project Psychiatry
19. SecED 70 WW 11 Mar 66, Parliament and Balniel
20. Exec Ltr 19 Jul 66, Public Attacks, Legal Point ✓
21. ED 21 WW 26 Sept 66, Current Attacks
22. Info Ltr 16 Oct 68, E-Meters replace Guns ✓
23. LRH ED 42 Int 4 Nov 68, Press Stories ✓
24. LRH ED 51 Int 24 Nov 68, Stability ✓
25. LRH ED 55 Int 29 Nov 68, The War ✓
26. LRH ED 63 WW 12 Dec 68, Re: Life article and letter ✓
27. LRH ED 66 Int 13 Dec 68, The Great Charity Swindle ✓
28. Clay demo: The Great Charity Swindle
29. LRH ED 69 Int 20 Dec 68, Western Countries ✓
30. LRH ED 75 Int 1 Jan 69, Good News
31. Info Ltr 17 Feb 69, Ron's Journal 68
32. Info Ltr 28 Feb 69, Ron's Journal No. 1 ✓
33. LRH ED 9 Mar 69, P.D.M. ✓
34. Info Ltr 16 Mar 69, Ron's Journal No. 2 ✓
35. Info Ltr 4 Apr 69, Ron's Journal No. 3
36. Note: 14 June 70, Extracts from LRH Communication
37. HCO B 16 Jul 70, The Psychiatrist at work
38. GO 166 7 Oct 71, Re: Books and entheta ..b
39. GO 637 10 Feb 73, Observations on the Great Health..
40. Essay: Who our enemies are and their tactics
41. _____
42. _____
43. _____
44. _____
45. _____
46. _____
47. _____
48. _____
49. _____
50. _____
51. _____
52. _____
53. _____
54. _____
55. _____

PART C - INTERSHIP UNDER DIRECTOR OF COLLECTIONS

SECTION 2 - C.I.C.

Date started _____ Date completed _____

PART A - REPORTS AND FILING

1. Drill: Get the definitions for C.I.C. for the various GO Bureaus
2. Desp. 16 Nov 69, Airmail express
3. Desp. 25 Feb 69, What is needed and wanted
4. Desp. 25 Feb 69, Mary Sue does not
5. ED 1175 Int 21 June 68, Intelligence Reports ✓
6. Clay dem: What data an intelligence report should contain
7. Drill: Pick up a newspaper and write a dummy report on an article of your choice.
8. GO 4 15 Feb 70, Guardian Communication Lines ✓
9. GO 995 21 Oct 73, Communications to the Controller
10. Desp. 11 Oct 72, Re: Weekly Reports
11. Desp. 12 Mar 73, Compliance Re: Weekly Reports
12. GO 802 21 June 73, Your Weekly Reports ✓
13. Drill: Mock up an Info Weekly Report
14. Desp. 14 Aug 70, To speed up the
15. Desp. 24 Aug 70, CS-G has ordered
16. GO 13 2 Sept 70, Bureau OIC reports
17. Drill: Write up a sample OIC Telex
18. Desp. 13 Oct 70, Re: Nudges
19. GO 35 19 Mar 71, Return address ✓
20. GO 151 7 Sept 71, Reporting ✓
21. Desp. 26 July 72, Re: Telexes
22. GO 905 21 Aug 73, Traffic to and from Controller ✓
23. Write up on writing of reports
24. GO 773 8 June 73, Excerpting Reports and Information ✓
25. GO 1219 HSH 7 Jul 74, Excerpting of Reports
26. Drill: Find a newspaper and do sample excerpting of 3 articles
27. Admin Ltr 15 Jul 70, Telex Codes
28. PL 11 Sept 73, Codes and Coding ✓
29. Drill: Mock up a telex using coding
30. PL 14 May 60, Clippings Book ✓
31. Drill: Go to Info Bureau and ask CIC Director if you may examine a clippings book to see how it is made up.

32. GO 38 14 Apr 71, Newspaper Clippings
33. GO 165 4 Oct 71, Re: Newspaper Cuttings ✓
34. Desp. 16 Oct 67, Re: Crossfiling
35. Desp. 19 Oct 67, Re: Crossfiling
36. PL 25 Apr 68, Intelligence Actions (section on files)°
37. Clay demo: Crossfiling
38. PL 18 Mar 72, Files
39. PL 28 June 72, Files Accuracy ✓
40. Eval on CIC Backlog
41. Essay: Purpose of filing and why it should be done accurately
42. GO 1197 20 June 74, C.I.C. Series No. 1 ✓ M7
M4
43. Clay Demo: The 8 filing categories
44. GO 1196 20 June 74, C.I.C. Series No. 2 ✓ M7
M4
45. GO 1195 20 June 74, C.I.C. Series No. 3 ✓ M7
M4
46. GO 1194 20 June 74, C.I.C. Series No. 4 ✓ M7
M4
47. GO 1193 20 June 74 C.I.C. Series No. 5 ✓ M7
M4
48. GO 1192 20 June 74, C.I.C. Series No. 6 ✓ M7
M4
49. Drill: Make out a report applying all the data you have learned on this checksheet. Take it to CIC Director for OK.
50. _____
51. ERI FILING LETTER 17. 25 APR 1975
52. ATTN: ADMIN TRF TRACK ✓
53. _____
54. _____
55. _____
56. _____
57. _____
58. _____
59. _____

60. _____
 61. _____
 62. _____
 63. _____
 64. _____

PART B - INTERNSHIP UNDER C.I.C. DIRECTOR

SECTION 3 - OVERT DATA COLLECTION

Date started _____ Date completed _____

BOOKS: To be read in student's own time

Conflict in the Shadows _____

Counter Insurgency Campaigning _____

PART A - INVESTIGATION

1. Look up the word "Scientology 5" on page 344 of Volume 4, OEC _____
2. PL 14 Aug 63, Scientology Five, Press Policies - • _____
3. Drill: Do the drill as per above PL _____
4. PL 11 Oct 65, Press Relations • _____
5. PL 15 Feb 66 Attacks on Scientology • _____
6. PL 17 Feb 66, Public Investigation Section • M7 _____
 • M4 _____
7. PL 18 Feb 66, Attacks on Scientology • _____
8. PL 25 Feb 66, Attacks on Scientology: (continued) • _____
9. PL 28 Nov 66, Intelligence Section: • M7 _____
 • M4 _____
10. Drill. Mock up a "five fact cable" _____
11. PL 25 April 68, Intelligence Actions ✓ M7 _____
 M4 _____
12. Desp. 3 Dec 66, Re: Noisy Investigations • _____
13. Desp. 26 May 68, Re: Intelligence • _____
14. Desp. 20 Sept 68, Re: NY Int • _____
15. Desp. 3 Nov 68, Re: Intell NY • _____
16. Desp. 28 May 70, Re: Further LRH remarks... • _____
17. Desp. 18 Oct 70, Re: Int. US • _____
18. Desp. 9 Mar 70, Re: Successful and unsuccessful actions ✓ _____
19. Desp. 23 Apr 74, Successful and unsuccessful actions • _____
20. Legal contract for outside investigators _____

21. GO 924 10 Sept 73, Guardian Office Alert ✓
22. GO 1206 22 June 74 The Snow White Program ✓
23. Essay: Why is it necessary to investigate somebody.
Should be at least 5 pages long and detailed
24. Clay demo: Purpose of an investigation
25. Write up: 2 June 69, Intelligence Stat ✓
26. ED 1802 Int 2 June 69, Statistics ✓
27. Write up: 23 Aug 71, Re: Stats
28. Write up: Stats for Dir Collections (this will be
your stat while on the internship)
29. GO 1150 7 May 74, Re: Info Bureau Statistics

M7

M4

30. Clay demo: Connection
31. Clay demo: Incident
32. Read Overt Data Collection Hat (in office space)
33. _____
34. _____
35. _____
36. _____
37. _____
38. _____
39. _____
40. _____
41. _____
42. _____

PART B - STRING PULLING

- ① Booklet: MCO Manual of Justice
- ② PL 11 May 65, Ethics Officer Hat
3. Clay demo: Pulling a string and finding a tiger
4. MCO B 2 Sept 72, Why Finding Drill II ✓
5. Drill: Student is to do the string pulling drill
(as per above MCOB) on Supervisor, until
the Supervisor passes the student, when he
is sure the student can pull strings.
6. _____
7. _____
8. _____
9. _____
10. _____
11. _____
12. _____
13. _____
14. _____
15. _____

PART C - INTERNSHIP UNDER DIRECTOR OF COLLECTIONS

SECTION 4 - COVERT DATA COLLECTION

Date started _____ Date completed _____

BOOKS: To be read in student's own time

Black Boomerang

Science of Survival

PART A - THE SPY AND HIS MASTERS (by C. Felix)

1. Look up in a BIG dictionary, use in sentences, demo kit and get conceptually the following words:

Spy	drop	confidential
Master	case officer	motivation
Cover	clandestine	sleeper
Out-Out	covert	
Secret	conspiracy	

2. Introduction, Vienna 1956, Chapters 1 & 2

3. Chapter 3, The Spy and His Masters

4. Clay demo: The Case officer - agent relationship

5. Clay demos:

A Cut-Out	Personal Gain motivation
A drop	Ambition motivation
A Safe House	Political motivation
Money motivation	Duty motivation
Compulsion motivation	

6. Chapter 4, The Art of Cover

7. Clay demo: Building a Cover

8. Chapter 5, The Art of Cover II

9. Clay demos: Front Group

Cover Organisation
Organisational Cover

- (10) Eval on Covers, by H. Brendel

11. Write up on covers

12. Drill: write up three possible covers in detail that you could use that are "real".
(ones that you could actually utilize)
Take them to Dir Collections for OK

13. Chapter 6, The Open Faced American

14. Chapter 7, Intelligence

15. Chapter 8, C.E. versus Security and other Delivery

16. Clay demo: Counter-Espionage

17. Chapter 9, Political Operations

18. Essay, What a Political Operation is

19. Part II, Fundamentals and Forms in Action

20. _____

21. _____

22. _____

23. _____
24. _____
25. _____
26. _____
27. _____
28. _____
29. _____
30. _____
31. _____
32. _____
33. _____
34. _____
35. _____

PART B - COVERT OPERATIONS

1. Transcript 6 May 66, Talk to SH, WW staff on Rh.nesia _____
- (1) Transcript 18 July 66, Conference with the Guardian.. _____
- (3) Transcript 25 Aug 66, LRM conference with investigators _____
- (1) Tape 2 Nov 69, Covert Operations I _____
- (4) Tape 6 Nov 69, Covert Operations II _____
5. Clay demo: An Agent Provocateur _____
7. Report: 10 Dec 69, Re: Jack Lundin Affair ✓ _____
- (1) Report "About the Apollo" _____
9. Report 31 Mar 71, Re: Jack Lundin ✓ _____
- (10) Write up: 12 Nov 69, PRO Area Control _____
- (11) Write up: 2 Dec 69, Confidential Intelligence. ✓ _____
- (12) Desp. 6 Dec 68, Re: Intell Possibilities for collecting _____
- (13) Write up: 3 Dec 69, Industrial Intell. Text Note _____
- (14) Transcript 10 Mar 71, Concerning Intelligence _____
15. Essay: What could happen to your network if data published doesn't cover your source. Also include several examples of how to cover your source when publishing data covertly obtained. _____
- (16) Book: Assault on the West, Chapters 6 & 9 _____
- (17) Note: Re Anonymous letters _____
18. Clay demo: Disinformation _____
- (19) Desp. 28 Feb 72, Re: Oberholser _____
- (20) Write up: 1 May 74, Re: Security and theft... _____
21. Clay demo: How the enemy operates in stealing materials by infiltration or by straight breaking entering and theft. Cover all steps of above write up. _____

22. Drill: Write up a proposed covert operation using clandestine operations, plants, counter-espionage, agents, case officers, cut-outs, secret intelligence operations. Purely on an intelligence basis that would terminatedly handle
(Note: This isn't always done in actual fact but the power of intelligence is such that it could be done and you should be real on that power). Take to Dir Collections for OK

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PART C- DEAD AGENT TECHNIQUES

- (1.) Book: Art of War, Chapter 13
2. FL 14 Nov 71, False Report Correction ✓
3. GO 011272 LRH 12 Jan 72, Black Propaganda ✓
4. FL 11 May 72, Black PR ✓
5. FL 21 Nov 72, How to handle Black Propaganda ✓
6. FL 12 Jan 73, The Safe Point ✓
(7.) GO 121509 NSM (3) 15 Dec 69, Intell - Dead Agent M7
M4
8. Clay demo: Major Target of above programme
(9.) GO 123071 LRH 30 Dec 71, Dead Agent Additional M7
M4
10. Obtain 3 entheta articles on Sen. Do a dummy dead agenting of all three with a letter to the editor for correction to be made.
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PART D - STRATEGY

1. Appendix II Scientific Method in DMSM
- ② Note: Clausewitz 1st Reciprocal
- ③ PL 16 Feb 69, Confidential, Enemy Names M7
M4
4. Drill: Locate in recent newspaper a hostile commentator (not necessarily hostile to Sen) to any group or person
5. Essay: What to do with Enemy Names and relation with PR
- ⑥ PL 16 Feb 69, Confidential, Battle Tactics M7
M4
7. Clay demo: The end product of our war
8. Essay: Good Intelligence pin points who, when, where, what
- ⑨ PL 16 Feb 69, Confidential, Enemy PRO's M7
M4
10. Clay demo: Tracing back each name to find the organisation in common
11. Drill: Go to files and go through some past untheta articles and spot enemy PRO's. Write up what you find, the party lines and non-squitter responses.
- ⑫ PL 16 Feb 69, Confidential, Targets Defense M7
M4
13. Clay demo: Defense is only effective when one sorties or attacks
14. Essay: Take each target, write up several ways in which Intell can bring it about

15. GO 060571 LRH 6 May 71, Secret, Working Theory ✓
16. GO 070171 LRH 7 May 71, Secret, Notes on Saersht ✓
17. PL 29 June 71, Confidential ✓
18. GO 82 19 June 71, For Public Advices ✓
19. GO 784 8 June 73, Intelligence, It's Role ✓

M7

M4

20. Clay demo: The first function of Intelligence
21. Clay demo: Support Intelligence
22. GO 901 22 Aug 73, Intelligence Estimations and Predictions ✓

M7

M4

23. Write up 14 Nov 73, Re: Estimates
24. Clay demo: Estimation
25. Essay: How to use "special banks" to predict
26. GO 1187 LRH 6 Mar 74, Strategic Info ✓
27. Clay demo: The Duties of Int. Chief (ref MSH writcup)
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29. _____
30. _____
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PART E - DRILLS

1. HOD: B 25 Sept 71, Tone Scale in full ✓
2. Drill: Student to detect various tones the coach assumes. Pass when student can identify each tone level easily.
3. HOD: B 26 Oct 70, Obnosis and the Tone Scale
4. Drill: Obnosis Drill (see para 5 of HODS) ✓
5. Chart of Human Evaluation
6. Essay: What use the above data and skills will have for you in the Info Bureau. Be specific.

7. TRO
TRO BB (with special emphasis on spying etc)
TR 1
TR 2
TR 3
TR 4
TR 6
TR 7
TR 8
TR 9

8. Do the following Reporter TRs to a pass by Supervisor

No. 2

No. 5a

No. 5b

No. 5d

Situation TR

9. Do TR-1

10. TR 3 Int and TR 3 Int with bullbaiting

11. Do TR 3 Int and TR 3 Int with bullbaiting with someone who has had some experience in info. This can be an interne or student who has worked previously in this area.

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PART F - INTERNSHIP UNDER DIRECTOR OF COLLECTIONS

SECTION 5 - INTERNAL SECURITY

Date started _____ Date completed _____

This portion of the checksheet contains the most vital data you need to know about Branch II. As Branch II is the portion of the Guardian's Office which probably comes into most contact with the Org in policing that policies are applied, you are advised to make yourself familiar with more policy than is contained herein. The policy sections which will be of most help are those in Volume I GOC on Ethics, including data on refunds, petition, appeal, further background data on Freeloaders, 2-D, Third Party, etc. You will find that you will probably have to research policy further as you handle your post, which is fine. An additional hat on all the useful PLs, HCO Bs that you come up with in the course of your post is a valuable asset.

PART A - GENERAL

1. PL 7 Feb 65, Keeping Scientology Working ✓
2. PL 18 Sept 67, Complexity and Confronting ✓
3. HCOB 25 Aug 60, New Definition of Psychosis ✓
4. HCOB 28 Nov 70, Psychosis ✓
5. PL 22 March 67, Urgent and Important
6. HCOB 10 May 72, Robotism ✓
7. Clay demo: What a psychotic will do to an Org
8. Clay demo: A Robot
9. PL 3 March 66 Attacks on Sen, Sex in Orgs ✓
10. PO 1729 13 Jan 69, 2-D ✓
11. PL 9 Feb 71, Executive Misbehaviour ✓
12. LRM resp. 26 Jan 72, Re: HCO State of
13. PL 13 Oct 72, Freeloaders ✓
14. HCOE 13 Dec 73, The Continued Missed W/H ✓
15. S.O. No.1 - Write up ✓
16. Essay: What useful info the S.O.1 line will give you
17. GO 1191 20 June 74 Re: Recruitment
18. _____
19. _____
20. _____
21. _____
22. _____
23. _____
24. _____
25. _____
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27. _____
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PART B - PERSONNEL DATA

1. PL 29 June 71, Org Personnel Recruitment ✓
2. PL 21 July 72, Staff Qualifications Requirements ✓
3. Desp. MSH 2 Aug 72, Re: Staff Requirements ✓
4. PL 5 June 71, FEBC Clearance ✓
5. PL 6 Aug 71, FEBC Clearance Amended ✓
6. GO 320, FEBC Students
7. PL 10 Feb 73, SP Declares and Hiring ✓
8. GO 824, 3 July 73, Requirements to Flag ✓
- 8a. GO 824-1 25 Nov 73, Important - Additional Requirements to Flag
9. FO 3454 11 Feb 74, Requirements for Personnel to Flag ✓
10. SO ED 221 Int 16 Sept 73, HCO Establishment Pgm ✓
11. SO ED 222 RA Int 2 Oct 73, The Lines for Personnel ✓
12. FO 3439 11 Jan 74, High Crime PL ✓
13. PL 16 Sept 73, Personnel Appointment ✓
14. Desp. 28 Nov 69, Confidential data for AG's L.L.
15. GO 21 9 Dec 70, Personnel Policy
16. GO 31 22 Jan 71, GO Personnel Qualifications ✓
17. GO 65 3 June 71, Re: Problems Check ✓
18. GO 209 1 Dec 71, Guardian Office Personnel
19. Essay: The requirements for GO and why we have them
20. GO 112669 MSH 26 Nov 69, Personnel Pgm No.2
21. _____
22. _____
23. _____
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PART C - INSTITUTIONAL AND SHOCK CASES

1. LRM ED 67 Int 15 Dec 68, Electric Shock Cases ✓
2. FL 16 May 70, Institution and Shock Cases ✓
Petitions from
3. FL 26 Oct 70, Institution and Shock Cases ✓
Posting of Bonds
4. FL 14 Dec 70, Institution and Shock Cases ✓
Petitions from Legal
5. FL 16 Feb 71, Institutions and Shock Cases ✓
Petitions from
6. GO 293 1: March 72, Institution and Shock Cases
Checksheet
7. Clay dem: The sequence of actions which have to
be done before an institutional or
shock case may come on lines

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PART D - TROUBLESOME SOURCES

1. FC FL 6 Oct 58, Who can be Processed, Who can be ✓
Trained
2. SEC ED 152 16 Mar 59, HGC Psychotic Applicants ✓
3. FL 23 Nov 59, Employment of Criminals Forbidden ✓
4. FL 30 Aug 60, Training Restrictions ✓
5. FL 4 Jul 62, Mixing Practices ✓
6. FL 10 Feb 64, Enrollment on Self Determinism ✓
7. FL 27 Oct 64, Policies on Physical Healing ✓
8. FL 13 March 69, Addition to PTS Policies ✓

M7
M4

9. PL 7 May 69, Policies on Sources of Trouble ✓ M7
M4
10. Clay demos: All 10 types of troublesome sources
11. HCOB 24 Nov 65, Level IV S & D ✓
12. PL 15 Nov 68, Disconnection Cancelled ✓
13. PL 7 Apr 65, Healing Policy in the Field ✓
14. PL 20 Dec 66, PTS Sections Personnel and Exccs ✓
15. CO 98 MSH 19 July 71, PTS Personnel
16. PL 12 May 72, PTS Personnel and Finance ✓
17. PL 5 April 72, PTS Type A Handling ✓
18. HCOB 10 Aug 73, PTS Handling: ✓
19. PL 15 Sept 73, Confidential, Handling Disconnections ✓
20. Desp. 3 Dec 70, Re: Case Histories
21. Clay demo: What you do with a Type A
22. Clay demo: What you do with a Type III
23. Essay: What could happen if you get a Type A to publicly disconnect from a family member
24. Essay: What are the possible repercussions of each type of PTS being allowed on lines unhandled.
25. BPL 9 July 74, Handling PTS and Out Ethics Personnel ✓
26. LRM ED 241 Int, 23 July 74, Potential Trouble Sources ✓
27. CO 1255 MSH 5 Aug 74, CO Amnesty Actions ✓
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PART 2 - SUPPRESSIVES

1. FL 7 Dec 56, Scientology Clean Up ✓
2. FL 1 March 65, Suppressive Acts ✓
3. FL 16 May 65, Indicators of Orgs ✓
4. FL 7 June 65, Entheta Letters and Dead File ✓
5. Clay memo: The Dead File Line
6. FL 7 Aug 65, SP's; Main Characteristics of ✓
7. FL 28 Dec 65, Enrollment in Suppressive Groups ✓
8. HCOB 28 Jan 66, How an SP becomes one ✓
9. HCOB 27 Sept 66, The Anti-Social Personality ✓
10. FL 29 June 68, Enrollment in SP Groups ✓
11. CO 207 30 Nov 71, SP Comments
12. Essay: The indicators of an SP and the indicators of an Org which has an SP on staff or in its vicinity
13. Exec Ltr 24 Sept 64, Removal of name ✓
14. Exec Ltr 17 Oct 64, Removal of name ✓
15. Exec Ltr 26 Oct 64, Re: Donald Kingsbury ✓
16. Exec Ltr 7 June 65, Removal of names
17. LRH Note on HCO EO 19 April 68 ✓
18. EO 9 July 65, No. 292 ✓
19. Exec Ltr 27 Sept 65, Re: Amprinistics ✓
20. LRH Desp. 27 Sept 65, Tag any Ethics Order...
21. EO 9 Dec 65, Robert De Grinston ✓
22. EO 17 Sept 65, Jack Horner ✓
23. EO 27 Feb 69, Dianology ✓
24. Note: The following people
25. Desp. 30 Nov 70, Re: Squirrel Groups
26. _____
27. _____
28. _____
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PART F - SECURITY

1. PL 30 Oct 62, Security Risks - Infiltration ✓
2. NCOS 8 Aug 63, Plants in Academies ✓
- ③ ED 1-42 Int 17 March 69, Status Verification Form ✓
4. PL 1 Sept 69, Counter-Espionage ✓
5. Reward Sign
6. PL 2 Sept 70, Instruction Protocol ✓
- ⑦ GC 160870 LRH 16 Aug 70, Guardian Office and S.O.
- ⑧ Write up 20 March 74, Re: Plants in Toronto Org
9. Clay demo: The indicators of a plant
10. Essay: Given a leak of a specific piece of data, to an outside body, how would you detect the plant.
11. Write up: Metered Plant Interview ✓
12. Drill: Do a metered plant interview on a doll
13. GC 26 20 Jan 71, Squirrelled Tech ✓
14. PL 25 July 70, Security Div I ✓
15. GC 1035 16 Jan 74, Manor Security ✓
- ①⑥ Bond
17. P.'s June 71, Confidential GOs ✓
18. NCOS 4 Aug 71, Purpose Clearing ✓
19. MSH Desp. 10 Aug 71, Internal Security ✓
- ②⑦ Insp. 28 Oct 73, Compliance Re: Security
21. CO 1155 28 May 74, Staff Status Verification Check
22. CO 1156 28 May 74, GO Security.
23. PL 16 Aug 66, Clearing Course Security ✓
24. PL 27 Nov 67, R6 Materials
25. PL 2 March 68, Advance Course Sec Check
26. PL 11 Aug 71, Advanced Courses Materials Security of Data
27. PL 7 Dec 70, Guardian's Office Mail ✓
28. CO 23 16 Dec 70, Confidential Mail Security ✓
- ②⑨ Desp. 4 April 74, Security Alert
30. Drill: Mock up a Security Alert
- ③① Desp. 17 May 74, Re: Debugging
32. Clay demos: 4 different types of bugs
- ③③ Write up: Actions to be taken when a theft needs to be investigated
34. Drill: Mock up a situation of a theft occurring and what actions you would take
35. Write up: How to do a full scale investigation
36. Clay demo: How to do a full scale investigation
- ③⑦ CO 1230 19 July 1974, Internal Security

38. GO 121669 MSH 16 Dec 69 Programme Intell; Internal Security

M7

M4

39. Clay demos: All 9 operating targets of above pgs

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PART G - INTERNSHIP UNDER BRANCH II DIRECTOR

Leif Windle
D/DG Info WW CanAn

for Mo Budlong
DG Info WW

for Jane Kember
The Guardian WW

12

ATTORNEY MICHAEL J. FLYNN

72 HIGHRIDGE ROAD BOXFORD

MASS. U.S.A.

JUST FEW DAYS AGO I FOUND OUT WHAT EUGEN
INGRAM AND HIS ASSOCIATES HAS BEEN DOING AND
HOW MANY PEOPLE THEY HURT. NOW IT IS TIME TO
FACE AND TELL THE TRUTH. I WILL BE GLAD TO
MEET AND SPEAK WITH ANY ONE REGARDING THIS
PROBLEM, PLEASE HAVE SOME ONE TO GET INTOUCH WITH
ME IF YOU WISH. I HAVE ALREADY SEND TELEGRAM TO
AMERICAN CONSUL IN NAPOLI AND MANY NEWS AGENCIES
IN U.S.A.

ALA FADILI AL TAMIMI

TAMIMI'S ATTORNEY
MR. VITTORIO GIRARDI
VIA DEI MILLE 16 NAPOLI
80121 ITALY
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CARCERE DI POGGIOREALE
NAPOLI 80143 ITALY

ESPRESSO



ATTORNEY MICHAEL J. FLYNN
72 HIGHRIDGE ROAD
BOXFORD MASS. U.S.A.
STATI UNITI

M. IT. ALA FADILI AL TAMIMI
VIA NUOVA POGGIOREALE N° 177
NAPOLI 80143

ITALY.

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

JULIE CHRISTOFFERSON TITCHBOURNE,)

Plaintiff,)

vs.)

CHURCH OF SCIENTOLOGY, MISSION)
OF DAVIS, a nonprofit California)
corporation doing business in)
Oregon; CHURCH OF SCIENTOLOGY)
OF CALIFORNIA, a California)
corporation, doing business in)
Oregon; and L. RON HUBBARD,)

Defendants.)

No. A7704-05184

AFFIDAVIT OF
GERALD ARMSTRONG

STATE OF OREGON)
) ss.
County of Multnomah)

I, GERALD ARMSTRONG, being first duly sworn, depose
and say that:

I was in Scientology from 1969 to 1981. During several
long periods in the 1970's I had direct contact with L. Ron
Hubbard and from 1979 through December 12, 1981, I worked
directly for L. Ron Hubbard in his personal office.

I am very familiar with the steps taken by Mr. Hubbard
and the Scientology organization to keep his whereabouts
and the fact of his control of Scientology a secret. I
am also knowledgeable of Mr. Hubbard's absolute control and
the means by which he effected it. In 1980, I saw and was
briefed on orders from Mr. Hubbard which showed his knowledge
of the Christofferson case.

1 I have reviewed the document entitled "Christo Final
2 Handling Eval" attached hereto which was produced in the
3 instant case by the Defendants. I am familiar with Scientology
4 and Guardian's Office terms, positions and activities and
5 am able to interpret the significance of this document
6 for the Court.

7 This document is a Guardian Programme Order (GPGMO),
8 an order for Guardian's Office staff with various specific
9 targets which must be carried out. The GPGMO is in the
10 form of an Eval, an evaluation or data analysis, which finds
11 a "why" or reason for a problem and seeks to correct the
12 problem with the specific assigned targets. This GPGMO
13 would have been issued in late 1981 since it refers to
14 Charles Parselle as being the Ex Deputy Guardian for Legal
15 at World Wide (E DGL WW). Mr. Parselle was removed as
16 DGL WW in the Summer of 1981.

17 There are various references to "Senior Advices" or
18 "R Advices" throughout this GPGMO. These terms were used
19 in the Guardian's Office and in all the top management units
20 of Scientology from 1978 onwards for "LRH Orders", orders
21 from L. Ron Hubbard. The reason for this was to cover up
22 the fact that Mr. Hubbard was issuing orders into the GO
23 or Scientology. The specific orders from Mr. Hubbard referred
24 to in this GPGMO are:

- 25 A. File a Counterclaim on Julie Christofferson;
- 26 B. Bring criminal charges against the litigants;

1 C. Launch criminal proceedings against the
2 investigators and perpetrators;

3 D. Disprove the false testimony and including
4 false PL's (Hubbard's Policy Letters); and

5 E. Take legal action against Judge Jones
6 for his making a mockery of the trial, including
7 criminal proceedings as his actions are assumedly
8 based in actual crimes.


9 A through E above were ordered by L. Ron Hubbard in
10 August/September, 1979. They are again ordered in late
11 1981, as laid out in pages 6-8 of the GPGMO. These targets
12 are given to All Clear IC US for execution. Mission All
13 Clear was the title given to the unit which had the
14 responsibility, as ordered by Mr. Hubbard, of resolving all
15 his legal problems to the point where it was "all clear"
16 for him to come out of hiding.

17 The following list of terms included in this GPGMO are
18 defined in order to assist the Court in understanding this
19 document:

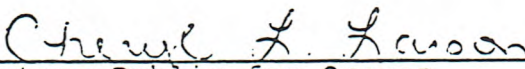
20	HCO P/L's	-	L. Ron Hubbard's Policy Letters
21	HCO B's	-	L. Ron Hubbard's Technical Bulletins
22	Comm Ev	-	A Scientology internal justice/ disciplinary body
23			
24	Watch Dog Committee	-	The secret group of top Commodore's messengers who ran Scientology, answerable only to L. Ron Hubbard
25			
26	. . .		

1	Founder/	-	L. Ron Hubbard
2	Commodore		
3	Q & A	-	"Question and Answer".
4			Non-compliance with
5			an Order
6	B1	-	Bureau One of the Guardian's
7			Office. The Intelligence
8			Bureau, responsible for covert
9			actions against people
10			viewed as enemies
11	CP	-	Charles Parselle
12	GAS	-	Guardian Activities Scientologist.
13			A covert operative for the Guardian
14			Office, not formally posted in the
15			GO
16	R	-	L. Ron Hubbard
17	OM	-	Omitted. Eg. OM Counter Attack -
18			Omitted Counter Attack, a counter
19			attack which should have occurred
20			but did not.
21			(The notations like OM Hardling,
22			Added Time, Wrong Target, etc.
23			under the Data Section of the GPGMO
24			are called "Outpoints". They are
25			also called "illogics" in the
26			Scientology logic system. They are
			errors or things which should not be
			there. The person or unit responsible
			for the error is noted to the right of
			the outpoint. Eg. Ex DG L WW is
			Charles Parselle).
	CI	-	Counter-Intention. Doing something
			other than what was ordered. In
			this case, Charles Parselle was CI
			to the LRH order to gather up
			evidence of crimes by the litigants,
			and was thus removed from his post.
	WHY	-	What caused the problem.
	Ethics Why	-	The "crime" or violation which
			supposedly underlies the problem.
			In this case, Charles Parselle had

1 failed to utilize and implement the
2 the LRH orders regarding getting
3 the litigants (Christofferson
4 and the attorneys) thrown in jail.

5
6 
7 Gerald Armstrong

8 SUBSCRIBED AND SWORN to before me this 8th day of
9 March, 1985.

10 
11 Notary Public for Oregon
12 My Commission Expires: 1-22-88
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HPO CH
INS

WNS Chief

GUARDIAN PROGRAMME ORDER

LL

GPGMO

*PTL-
AUG
SI*

CHRISTO FINAL HANDLING EVAL

POLICY

Senior advices on Christo.

Nothing in this eval may be interpreted to violate or alter or change HCO PL's or HCOB's. Anyone executing a target in this eval in such a way as to violate or alter any HCO PL or HCOB will be actionable by Comm Ev. Any recommendation in this eval or change or policy or tech must be cleared by the Watch Dog Committee (WDC) before being placed in the eval as a target and resulting PL or Bulletin must be reviewed by the Founder personally. All data or handlings where they refer to policy or bulletins must give the policy or bulletin number and its location and text verbatim.

SITUATION

Senior advices on Christo have not been carried out while our legal actions have merely amounted to a shuffle with no win, no prosecutions.

STATS

No Gunter Claim ever filed on Julie Christofferson.

No Criminal charges ever brought against litigants.

No criminal proceedings launched against the instigators and perpetrators.

No handlings ever done to disprove false testimony and including false PL's.

No legal handling ever taken against Judge Jones and his actions to make a mockery of this trial (which are assuredly based in actual crimes).

(All the above were ordered by Senior Advices issued August/September 79.)

-2-

Endless Q&A between BI and Legal over what is needed to bring criminal charges.

The original Christo Eval (on the loss) was done by C.P. in August 79 and was actually not approved. (Point G insufficiently broad sit.)

The Bright Idea of that was "revised" 14.10.79.

The Bright Idea was "re-revised" 11.11.79.

Christo Suit was re-programmed (not off an eval) in June 80 and this called for setting up GASEs, paying the attorney, Q&A over if we had or could even get enough data on filing criminal charges.

January 81 Opening Appeal Brief was filed by us and virtually is devoid of any attack lines, while McMurry's response is 234 pages, replete with attack lines on us.

Christo was re-eval'd again recently by CP who did not and would not use Radvices. This resulted in a failed mission, cross orders, CP's disapproval of a suit that would counter the Christo attack (and was based on R advices).

DATA

Christo suit was originally filed in 1976 based upon spurious charges and vicious attacks upon Scientology, its tech and policy (essentially putting Scientology on trial as a fraudulent organization, which is forbidden by the 1st Amendment of the Constitution). No counter claim was filed. The basic strategy was to assert the 1st Amendment protections (which is defensive). From 1976 to 1979 this suit remained in neglect (with USGO Legal directed onto criminal matters after the 1977 raid as a higher priority action (which again was defensive)).

OM COUNTER ATTACK	LEGAL US/LEGAL WW
OM HANDLING	LEGAL US/LEGAL WW
ADDED TIME	LEGAL US/LEGAL WW
WRONG TARGETS (2)	EX DG L WW (CP)

We lost the Christo case in August 79 with a trial that was a mockery, with tainted jury members, a Judge who based his opinions on data he obviously obtained outside the courtroom, false testimony and known evidence sufficient to support a mis-trial.

-3-

CP's ordered handling of this was to defend the Constitutional Rights of other religions. This is a Legal Shuffle. This Eval's bright idea was not approved and rather than re-evaling CP issued another "Bright Idea" which was basically attempting to employ positioning tech, targeting the opposition attorney's words and legal tactics. This is another Legal Shuffle.

This "bright idea" was obviously also not bright enough as it was again revised. Charles added the R advice; on getting litigants under criminal charges before the Appeal to his already existing, incorrect bright idea. The eval was never redone correctly to actually encompass the broad situations that the Advices point out (such as "false testimony exists among Legal Ranks and courts in courts including false PL's").

OM OFFENSIVE TO OBVIOUS CRIMES	EX DG L WW CP
WRONG TARGET	EX DG L WW CP
WRONG SOURCE	EX DG L WW CP
OMITTED CONFRONTING AND HANDLING OF CRIMINAL ELEMENTS	EX DG L WW CP
WRONG SOURCE (3)	EX DG L WW CP
OMITTED EVAL	EX DG L WW CP

After the trial, but before the decision on the Motion Notwithstanding Judgment, the Judge appeared on radio with Peter Rudie, one of the opposition attorneys wherein they spewed entheta on "cults." No legal action was taken on the Judge, such as an ethics complaint, criminal charges, mis-trial or a demand for his immediate removal from the case.

OM OFFENSIVE	EX DG L WW
--------------	------------

B1 was to gather up evidence of crimes by litigants and others per the advices given. Ex DG L was CI to this, stating at the time that B1 did not know what legal wanted, and could not come up with useable evidence. In actual fact, B1 did come up with useable evidence two years ago. This was not used for criminal complaints, but was used to file a civil suit against Christo's mother, the deprogrammers. This did not name Christo and is not a Counter Attack.

FALSEHOOD	EX DG L WW CP
WRONG TARGET	EX DG L WW and
	LEGAL US
ADDED TIME	L WW/L US
QM COUNTER ATTACK	L US

-4-

In early 1981 B1 collected up further data as per the advices, including letters from deprogrammer Alma Hall to the criminal psychotic Tom Seville which show crimes were committed and show further strings to pull for further, more serious crimes. B1 analyzed this data and packaged it recommending a criminal action and counter offensive suit which could become a counter claim (in the event of re-trial). This was entirely programmed out. CP nixed the Counter Offensive, favoring instead a Jury Misconduct suit which is not a counter suit, has minimal viability, but is offensive. Charles thought the purpose of filing such a suit was to get publicity, before the appeal (not to win it). But the advices are to get JAIL sentences before the appeal.

CORRECT TARGET

B1 (M.V.)

WRONG SOURCE

CP

WRONG TARGET

CP

Charles nixed this Offensive Suit on his way to Portland on a Cristo Mission. This Mission was called from off an Eval that Charles did (following his removal from post by Comm Ev). This eval came up once again with a situation that was insufficiently broad, did not use the R advices, and once again gave the legal shuffle. His why was that the GASEs in Portland were not hatted on attack and so he set out to "hat" them. This hating did not include all the R advices (and in fact only one GAS saw some of them). CP, who later wrote up 19 pages of disagreements with the R advices, "quailed" the GASEs hating on attacks and refused his Msn Ops order to incorporate the R advices and launch a proper offensive, nattered to the GO Portland staff about having been removed and getting his issues cancelled. In actual fact, Charles sabotaged the actual preparation of the Appeal and the Appeal drafts just turned in by these GASEs are an overt product.

WRONG SOURCE (3)

CP

WRONG TARGETS (3)

CP

The WW staff, US staff and Portland staff were all of the assumption that Charles ethics were handled. The matter of how Charles got through SB WW Qual and Ethics lines is covered already by the second Comm Ev on CP. His mission second (Jere Matlock) returned from this Mission wanting to leave staff and is still on Ethics lines.

OM PERCEPTION

Those WW/US/Portland staff
concerned

-5-

OUTPOINT COUNT

OMITTED)
WRONG TARGET) Are the major outpoints.
WRONG SOURCE)

The majority are assigned to ex-DGL WW, CP.

WHY

The obvious offensive data needed to start criminal proceedings moving and win this case has never been utilized.

ETHICS WHY

ACTIVE AND HIDDEN AND CONTINUAL STOPS ON UTILIZATION AND IMPLEMENTATION OF R ADVICES.

WHO

CP, Ex-DG L WW

IDEAL SCENE

CRIMINAL PROCEEDINGS LAUNCHED AGAINST THE INSTIGATORS AND PERPETUATORS AND CASE WON.

HANDLING

BRIGHT IDEA

USE THE BRIGHT IDEAS ALREADY GIVEN US VIA ADVICES AND GET THESE DONE, NO Q&A, WITH CRIMINAL PROCEEDINGS UNDERWAY AND CASE WON.

RESOURCES

ADVICES

B1 DATA AND ANALYSIS PREVIOUSLY DONE

M.V. WHO IS NOW LEGAL US STAFF AND KNOWS AND USES ADVICES.

CORRECT CHANNELS ON WHICH TO ROUTE EVIDENCES OF CRIMINAL ACTIVITIES AND CONCLUSION.

-6-

PLAN

1. Immediately file Criminal Informations with Portland AUSA and simultaneously with DOJ Civil Rights Board in DC.
2. Get the extension already filed on the Appeal Brief Date.
3. Get the Appeal Brief qualling and needed re-write into the hands of MV and get this produced from R advices.
4. Get the Offensive Suit approved, PR flanking worked out and rapidly filed in Portland for a hard hit against Christo and her cohorts.
5. Push through the Criminal complaints until the product is obtained. This is done in liaison with BI's current Mission to Portland that will dig up more dirt, feed it to PR and Legal and fully expose the collusion and crimes.
6. Demand that PR tries this suit in the Press loudly and exploiting every Legal offensive and win.
7. Get the Appeal Brief filed.
8. Handle the Portland attorney (he most likely has false data and overts since CP's Mission). If he does not handle rapidly - like in an hour from time handling begins - fire him and get someone who has never lost a case.
9. Via WUS Asst. get the Portland staff cleaned up fast with Ethics/Qual handlings on the False Data from CP. Meanwhile by-pass these and their GASes until Danger handled.
10. Do likewise with Legal US staff.
11. Get the criminal proceedings carried out and the Appeal filed and pushed to the win.

PROGRAMME:

1. Immediately get the BI data utilized via Criminal Information complaints: a. One filed with AUSA in Portland in person and ensure the data arrived into the proper hands with impingement. b. Letter off to DOF, DC.

✓
ALL CLEAR IC US

-7-

2. The Appeal Brief filing has been requested to be extended. Get this extensionX

✓
ALL CLEAR IC US

3. Get the Offensive Suit filed, with a big PR flank.

ALL CLEAR IC US

4. From the current B1 Mission, get the data on further string pulls and more serious crimes brought directly to legal, fed into our now filed complaints and pushed into the hands of terminals in DOJ and AUSA who will prosecute the guilty terminals.

ALL CLEAR IC US

5. Ensure B1 data on JR Jones is used to the hilt as we want criminal proceedings against this judge as well and prior to the Appeal being filed.

?
ALL CLEAR IC US

6. Get Attorney Merten to LA as rapidly as can be and get him cleaned up and onto SR advices and firmly on staff and not half way on staff. If he does not immediately come around, fire him and get someone who is with us.

✓
ALL CLEAR IC US

7. Conditional: Get the new attorney briefed, onto the advices and winning with an offensive.

ALL CLEAR IC US

-8-

8. Work out via Attorney Merten, solutions to beefing up this Christo Barratry suit (the civil suit filed in lieu of a counter claim). Get it beefed up and on the offensive.

ALL CLEAR IC US

9. Keep the heat on the DOJ complaint to DOJ. (DC will have to be briefed on this matter and be able to debug on the spot and assist in getting the product we want.) Keep the pressure on this via a PR flank that makes a stink.

ALL CLEAR IC US

10. PR will have to try these cases (civil and criminal) in the press and very, very loudly. If Portland press won't carry, get a media that will carry. Use DC PR to make them make a national issue.

DG PR US

11. Get criminal proceedings and get charges brought.

ALL CLEAR IC US

12. Get the Appeal Brief in, heard and a win on this.

ALL CLEAR IC US

13. Get all named sits as outlined in advices assigned and evalled. Legal will do "False testimony and false PL's" eval.

AVU

14. Four final targets.

G Pgm O 4115-2
Sup: MPC WW

17 November 1979

JULIE'S BACKGROUND
(REF: GPCMO 4115)

INFORMATION: G Pgm O 4115 lays out broad steps to be taken to document that the people involved in the Christo case are criminals with criminal backgrounds and criminal records and that they engaged in a criminal conspiracy to defraud the organization under the guise of "home and mother". Julie appears to be pure as the driven snow, so considerable background data on her is needed to give us direction in locating the real facts of interest about her.

MAJOR TARGET: The criminal background, drug history, record of arrests, former employment, perversions of Julie, fully known and documented, as needed.

PRIMARY TARGETS:

1. Somebody there: West Sec BI US.
2. Worthwhile purpose: To provide evidence of Julie's criminal nature and background.
3. Somebody taking responsibility for the area or action: WEST SEC BI US, BI Programmes.
4. Form of the Org Planned Well: West Sec to locate a writer in LA or Portland who is interested in writing a book on Julie. This writer is already at least somewhat established - he has written at least one or two articles, papers or books. CO is either West Sec or or AGI Portland. Daily report line set up, and phone calls every two days. WEST SEC BIUS _____
5. Form of the org held or reestablished: GAS run with tight SC, and Daily reports READ DAILY, with no BI's shrugged off. WEST SEC BIUS _____
6. Org operating: Programme begun on receipt as highest priority.

VITAL TARGETS:

1. Security course data FULLY applied to GAS. WEST SEC _____
2. Finances arranged immediately so they are there when GAS ready. WEST SEC BIUS _____
3. GAS gets agreement in writing that his product is of interest to a publisher. (No formal contract needed.) WEST SEC _____
4. Julie interviewed first, very lightly. Let her know pro-Julie book being written with lots of human interest and theta about her and enthea on nasty C of S. WEST SEC _____

OPERATING TARGETS:

LIBBY/EUREKA, MONTANA

From 1967 to 1972, the Halls lived in Eureka at which time they moved to Libby, where they currently reside. Thus, most data of interest on Julie would be in Eureka as she attended fourth grade through high school there.

1. Go to the Lincoln County High School and meet the person in charge of students. Get a list of people to interview who would know the most about Julie. Get a letter of introduction from him.

WEST SEC BUIS _____

2. Ensure Julie's pastor, friends, classmates, boyfriends are gotten.

WEST SEC BUIS _____

(Note - although targets are assigned to West Sec, they are done by whomever is assigned to them by West Sec.)

-2-

3. Locate and interview Julie's pastor. Find out any involvement of his in the suit, any data he has on Julie's conduct pre-Scien-tology, leads from him on who else to talk to. Get all the data he has on her background and related subjects.

WEST SEC BIUS _____

4. Conduct as many other interviews as possible. Include her former employers, classmates, Lutheran Church youth groupclass-mates, teachers and find her boyfriends to get all data about her early promiscuity and sexual conduct. (Session data indicates she had been concerned in the past

[REDACTED]

WEST SEC BIUS _____

5. List out all strings which have surfaced and pull those which are in this location.

WEST SEC BIUS _____

5. Get affidavits wherever possible; but only on data which fits the major target.

WEST SEC BIUS _____

6. Contact Phil and Farrel LaClaire and interview them for data and other leads to people unfriendly to Julie.

WEST SEC BIUS _____

7. Get any private investigator reports Phil has gotten from the PI he hired awhile ago to determine if any data is of interest regards Julie.

WEST SEC BIUS _____

8. C/S Phil on the PI cycle if it looks fruitful and usable.

WEST SEC BIUS _____

9. From above targets, list out further strings which will lead to discreditable data including the following (if not already gotten):

- a. Trips made by Julie C.
- b. Why Julie came to Portland to "get away from boy friends"
- c. When Julie hooked up with Bob Titchbourne (reported to be Setp. 77)
- d. Why Julie was married outside of her church
- e. any arrest records of Julie

WEST SEC BIUS _____

10. Pull these strings and affidavit or document as possible, data of interest.

WEST SEC BIUS _____

11. Locate the father of Mike _____, who claims Mike went to the mental hospital due to Pat Osler giving him hash. This Mike was supposedly friends with Osler and Julie.

WEST SEC BIUS _____

12. Interview him for any discreditable on Julie C. Get affis and leads to others with discreditable data.

WEST SEC BIUS _____

13. Interview Julie's employer in Kalispell Montana and any fellow employees for data and discreditable. Get affidavits as possible or documentation.

WEST SEC BIUS _____

-3-

14. Interview Julie's physician in Whitefish, Montana, for any psychiatric connections, promiscuity, etc. Document and/or affidavit as possible.

WEST SEC BIUS _____

15. Review all data gathered in the Montana area and ensure all possible strings have been pulled and documented.

WEST SEC BIUS _____

PONNERS FERRY, IDAHO:

Julie was born here 14 August, 1957, and lived here until she was about 4 or 5 years old.

16. CANCELLED

EUGENE, PHILOMATH, SWEET HOME, OREGON:

The Halls lived in Sweet Home from 1963-33. Robert Lethrud and his wife (he's Alma's son) live currently 30 miles away in Philomath. Lethruds were in comm and exchanged visits with Julie about once a month while she was in Scientology. Father Kent Burtner has done ARM work in Sweet Home. About 40 miles south of Philomath is Eugene, where Burtner was until his transfer to New Mexico.

17. Locate where the Halls lived while they were in Sweet Home.

WEST SEC BIUS _____

18. Interview neighbors for data and leads to others in town who would know more about Julie's later life.

WEST SEC BIUS _____

19. Find the Lutheran Church which Julie supposedly attended and interview the pastor there for any data.

WEST SEC BIUS _____

20. Find someone who was close to Burtner and interview them for any data of interest of Burtner's contact with any of the people in this case, particularly Julie.

WEST SEC BIUS _____

21. Interview the Lethruds for any data of interest regarding Julie's early days. Do they have any data regarding Julie's step-father making advances to her when she was about 5 years old? Do they have any data regarding Alma leaving Julie with "other people" when she went to Europe rather than with the step-father because of what people might think? (Session data)

WEST SEC BIUS _____

22. Pull any remaining strings and get affidavits/documentation where possible.

WEST SEC BIUS _____

PORTLAND AREA:

23. Interview neighbors and residents of the house Julie first lived in when she moved to Portland. Get discreditable data and affidavits as possible (1035 S.E. Bodwell.)

WEST SEC BIUS done

-4-

24. Julie said she went to the Lutheran Church on 10th or 12th Street a few times. Interview the pastor there and see if he remembers her. Get what data would be useable plus any discreditable data and affidavit.

WEST SEC BUIS done

25. Julie moved from Robin Jones' house on Bodwell on July 30 to an apartment with Linda Shelly. Ensure Jones and Shelly are interviewed suitably and affidavit as possible any useful data.

WEST SEC BUIS done

26. Julie worked at the Heathman House while on ethics lines. Interview her boss and fellow employees for data on her and any discreditable data. Affidavit as possible.

WEST SEC BUIS _____

27. The day Julie's pastor brought 5-6 high school students to Portland to see Concordia College, Julie met them for lunch and drove back to Montana with them. This was the start of her de-programming. Check at the college for students from the Libby area. Interview them from a position of altitude and get any discreditable data or leads they might have. Affidavit any useful data.

WEST SEC BUIS _____

28. It must be determined how Julie did get the job at Tom Saville's company. Did he know her family?

WEST SEC BUIS done

29. Interview company employees of Saville's company, Northwest Detailing Service for data on Julie and Saville's relationship. Affidavit any useful data.

WEST SEC BUIS _____

30. Saville reportedly told Julie that the Comm Course was making her worse, not better. Get contrary data on Julie affidavit by employees.

WEST SEC BUIS _____

31. Find out why Saville and Julie maintained a comm line after she left his employ.

WEST SEC BUIS _____

32. Find out why Saville threw two parties for Julie who was only working there for two months. (In September, 1975, he gave her a going-away party after all her complaints about what a rotten person he was).

WEST SEC BUIS _____

33. Interview Mrs. Saville suitably for any information on Julie of use. Does she know how Julie got her job at Saville's firm? Was there 2D going on between Saville and Julie or Julie and anyone else?

WEST SEC BUIS just a question. done

34. In Julie's 1975 income tax filing, she made no mention of her earnings from Northwest Detailers. Did Saville have her on the books or not? What was her salary, bonuses?

WEST SEC BUIS done

35. Get access to any Northwest Detailing records on Julie and get any pertinent data from the records, legally.

WEST SEC BUIS done

-5-

36. Get a list of all the Scientology staff and public who knew Julie. Have each interviewed from a prepared list of questions and pull all strings. Find out everything they know about Julie with emphasis on discreditable and/or criminal activities and/or perversions.

WEST SEC BUIS _____

37. Ensure Jessica Marks is interviewed for all her data and leads to others who could give data.

WEST SEC BUIS one _____

38. Review all data collected and list out any remaining strings.

WEST SEC BUIS _____

39. Get these strings pulled and all useful affidavits collected.

WEST SEC BUIS _____

PRODUCTION TARGETS TO BE SET ON INDIVIDUAL MISSIONS ORDERS.

GpgmO 4115-4

GUARDIAN PROGRAMME ORDER

26.11.79

SUPE: MPMOM

REF: GPMO 4115

ALMA'S BACKGROUND

INFORMATION: GPMO 4115, CHRISTOFFERSEN SUIT PLAN, lays out the broad steps which must be taken to document that the people involved in this case are criminals with criminal backgrounds and criminal records and that they engaged in a criminal conspiracy to defraud the organization under the guise of "home and mother".

Plan Step 1 orders that the criminal background, drug history, record of arrests, former employment and perversions of those involved be found and documented, including Alma Hall.

As investigations will need to be done for Julie Titchbourne's background and Alma Hall's background in the same areas, care should be taken to get these investigations done-tailed so as to avoid duplicative work and avoid any possible double stimulation of local folks. It must also be noted that the Plan states "If it is not possible for BI GAGs to provide legally useable data then private investigators may need to be employed and financial arrangements made - but whatever the case is, the data is to be gotten very rapidly in fully useabl form".

MAJOR TARGET:

The criminal background, drug history, record of arrests, former employment, perversions of Alma Hall known and documented.

PRIMARY TARGETS:

1. SOMEBODY THERE: WEST SEC BUIS
2. WORTHWHILE PURPOSE: Evidence obtained on Alma's background showing her criminality.
WEST SEC BUIS
3. SOMEBODY TAKING RESPONSIBILITY FOR THE AREA: WEST SEC BUIS, BI PMS
PROM OUT US, BIPUS
4. FORM OF ORG PLANNED WELL: See G Pgm O 4115-2 Julie's Background. The operating targets in this programme will be done using the same set-up.
5. FORM OF ORG HELD OR REESTABLISHED: See G Pgm O 4115 - 2.
6. ORG OPERATING: See G Pgm O 4115 - 2.

VITAL TARGET:

This programme is to be done together with G Pgm O 4115-2, Julie's background, by the same suitable GAG.

WEST SEC BUIS

OPERATING TARGETS:

BONNERS FERRY, IDAHO:

Alma apparently moved to Bonners Ferry from Spokane, Washington, after World War II. She and her new husband, Andrew Christofferson, a carpenter, moved here. She worked as a secretary in the Welfare Office, holding this job for about 6 months. During the 1950s, she worked for the First National Bank in Bonners Ferry for seven years. It appears Alma got a divorce and re-

-2-

married within a year. She married Berwin V. Hall, her present husband. They lived in Bonners Ferry for about a year, 1961 to 1962, when they moved to Yellowtail Inn, Montana. In 1963, the Halls moved to Sweet Home, Oregon, where Alma worked as a bank teller, then, in 1966, they moved to Eureka, Montana where they stayed until 1978.

Chances are that relatives of Alma's three husbands are still in this area (Lethrud, Christofferson and Hall), so all possible leads should be followed to locate and interview these people. Alm still has contacts in these areas as she has called there and visited from time to time.

1. Locate and interview the following for data on Alma's criminality, drug history (if any), record of arrests, former employment, perversions: (NB: all the following people may not have data on each of these points, so get whatever data can be gotten without freezing up the corn lines)
 - a. relatives of Alma's former husbands (those who dislike her, preferably).
 - b. Andrew Christofferson himself.
 - c. Former neighbors of Alma's
 - d. Employer and people who worked with Alma at Kelson Lumber Company from 1949 to 1951.
 - e. Check with local police to ascertain any arrests records, etc.
 - f. Check the court house, criminal dockets, for any records of Al.
 - g. Per data of Julie's there was a time when Al was planning to go to Europe and preferred to leave Julie with "other people" than Berwin Hall because of what people might think. Julie stated in session that Berwin "put his hands on her" when she was about 5 years old (circa 1962). Is anything known about why Al felt like this, i.e. did she know about any of her husband's perversions yet cover them up, disregarding her own children's welfare?
 - h. Did Al go to Europe and if so, how was this afforded and why did she go?
 - i. Pull any other strings that crop up which will get data and documentation of the points in this target.

WEST SEC BUIS _____

SWEET HOME, OREGON:

The Halls lived in Sweet Home, Oregon, from 1963 to 1966 and Al worked as a teller in a bank there. Al's son, Robert Lethrud, and his wife live about 30 miles away in Philomath.

2. Locate and interview the following for any data on Al's criminal background, drug history, record of arrests, former employment, perversions (NB: not all people will have data on each point but get whatever each gives you and go for documentation where at all possible):
 - a. Former neighbors
 - b. Employer and fellow workers in the bank (if still around)
 - c. local Lutheran church's pastor
 - d. local police and court house for any arrest records, etc.
 - e. any leads given out by these people.

(LIBBY/EUREKA, MONTANA AREA:

From 1967 to 1978, the Halls lived in Eureka, Montana, after which time, they moved to Libby, where they currently live. Thus, most data of interest on Al may be here. A previous mission to Libby found it tough going due to the smallness of the community and short comm lines. This must be taken into consideration so all necessary strings do get pulled without alarming any of the local folks.

3. Contact Phil and Farrel LaClaire and interview them for data and leads to people unfriendly to Al.

WEST SEC BUIS _____

4. Interview the LaClaire's for data on Farrel's cousin who was sent to a mental hospital due to suppression from Alma and had business deals with them which reportedly cost \$28,000. Get full affidavits from them on Al's criminality.

WEST SEC BUIS _____

5. Make arrangements to interview the husband of this cousin for his data on the scene and get affidavits from him on Al's criminality.

WEST SEC BUIS _____

6. Get any reports which Phil LaClaire may have gotten from the private investigator he hired and see where this cycle stands regarding Al's shady business deals.

WEST SEC BUIS _____

7. C/S Phil on the private investigator cycle if it looks fruitful and of use to you.

WEST SEC BUIS _____

8. Interview the names gotten in target 3 for data on Al's criminal background, drug history, record of arrests, former employment, perversions and get affidavits wherever possible. Also get any leads from these people to others who would likely have more data.

WEST SEC BUIS _____

9. Check the court house - criminal docket - for any records of arrests of Al.

WEST SEC BUIS _____

10. Check suitably with local police re any data they may have on Al's record or criminal background.

WEST SEC BUIS _____

11. Talk with the local Lutheran pastor about Al and see what he has to say that would be of interest to you.

WEST SEC BUIS _____

12. Al's financial status must be determined. There are several contrary facts regarding the Halls' financial standings over the years which need to get sorted out as it is this area which may lend itself to more crimes, etc. (In about 1975, Julie reported that Al and husband were hard-pressed for money and don't want her to do Scientology as they won't get Social Security benefits for her unless she goes to college. In 1975, also, Al gives Ted Patrick \$2,000 for the failed deprogramming of Julie. In about January, 1978, Al was not "hard-pressed" for money. During the court case in 1979, Al says she "may not have" reported the fee she received for a deprogramming done in Pennsylvania (\$450). Attorney Powers says the fees for the case so far, as of July 1979, are \$135,522. In March 1978, Al said the Marks case against her would cost a lot of money and she had a lot of attention on it. Her husband had retired but he had to go back to work because they needed the money to fight the suit. Undated and unverified report was that she had probably misappropriated funds from a trust fund which she administers and she and her husband bilked about \$28,000 out of the LaClaires in a business deal.)

WEST SEC BUIS _____

-4-

13. A GAS is checking the phone numbers called by AI which she has claimed as deprogramming expenses. Get this completed and check these numbers for leads to interview others.

WEST SEC BUIS _____

14. As this data comes in, ensure the strings are fully pulled, the needed documentation and affidaviting is done and Legal is given all data which is useful to them.

WEST SEC BUIS = _____

15. Ensure this data gets filed according to (NYO) 4115-1.

CIC SEC BUIS _____

PRODUCTION TARGETS TO BE SET ON MISSION ORDERS IN CONJUNCTION WITH JULIE
PGL

- 2 -

The intention is to see these people in prison or out on bail at the time of the appeal.

It is certain that in other deprogrammings the deprogrammers named below have participated in any damages or monies or awards resulting from their deprogramming. It would be almost impossible for this not to have occurred. It will be used as conclusive evidence that they are in the business to make money and to shake people down!!

B1 WW need to liaise with Legal throughout to ensure data gotten is legally useable and what is wanted. If it is not possible for B1 GASes to provide legally useable data then private investigators may need to be employed and financial arrangements made - but whatever the case is, the data is to be gotten very rapidly in fully useable form.

1. The criminal background, drug history, record of arrests, former employment, perversions of: a) Ted Patrick; 2) Reid Heller; 3) Pastor Gary Burke; 4) Alma Hall; and 5) Julie Hall, AKA Julie Christofferson, AKA Julie Titchbourne. (Programme is to be done for each).

DG I US
US Sec B1 WW

2. The establishment and documentation of any and all connections between Alma Hall or Julie Hall and one or all the names above, a) currently, and b) prior to July 13, 1975. (Programme to be done).

DG I US
US Sec B1 WW

3. Obtain all evidences of implantation, hypnotism or coercion or compulsion of the above named person in other sectors to establish that they are capable of using hypnotism and implantation to effect the execution of their desires. (Programme to be done).

DG I US
US Sec B1 WW

- 3 -

4. Establish any and all agreements of participation in suit awards amongst any of the above named persons. (Project to be done).

DG I US
US Sec B1 WW

5. All this evidence is to be assembled with an eye to establishing that Julie Hall was probably a drug addict, probably has a large and extensive criminal background and record and has been party to other collusions and swindles or crimes or felonies possibly from her earliest history. (Programme to be done).

DG I US
LR WW, AGL DC
US Sec B1 WW

6. We also want the similar background obtained on Alma Hall. (Programme to be done).

DG I US
LR WW, AGLDC
US Sec B1 WW

the Church of Scientology of California and COSMOD.
(Supp. Ab.-89-113)^{2/}

V.

RELATOR, BY ITS CONDUCT, WAIVED THE RIGHT
TO MOVE FOR DISQUALIFICATION OF DEFENDANT JUDGE

Not only did Relator fail to orally notify the Presiding Court of its intent to file an Affidavit of Prejudice, but also Relator appeared before the trial Judge and requested that hearing on the Motions before him be postponed, without giving any notice of an intention to move for disqualification. Relator had submitted to the Court a Memorandum of Law in Support of its Motion to Dismiss, and another regarding its appearance as purported Indemnitor of Hubbard. Relator was also fully aware that the trial Judge was considering the issues presented in Plaintiff's Motion

^{2/}

It should be noted that the Defendant Judge received the assignment of this case more than a year prior to CSI's attempted appearance and had ruled on a number of motions concerning Hubbard's concealment, control of Defendant corporations, and the requirements of substituted service.

DECLARATION OF JOSEPH M. FLANAGAN

I, Joseph M. Flanagan, being sworn, hereby state and declare:

1. I have known Paulette Cooper since June of 1979. She has told me, and others, on several occasions that she considers me one of her closest friends. She has frequently confided in me, especially on matters concerning Scientology.

2. In late January, 1985 Paulette called me to tell me that there was a realistic possibility that she could settle her numerous lawsuits with the Church of Scientology by herself. From that point on she kept me informed of her settlement negotiations.

3. In early February, Paulette indicated that negotiations had reached a critical stage and asked me to come to New York in order to discuss the negotiations with her. She was negotiating with the Scientologists by herself, and refused to allow her lawyers to get involved.

4. When we met on February 8, 1985 in her apartment, she told me that she realized just how much the Scientologists hated her attorney, Michael J. Flynn. She was convinced that they hated him more than her and that their hatred was so fanatical that they were willing to deal with even her. Paulette desperately wanted to settle and realized that Flynn was the Scien-

tologists' "button;" they would do anything to attack him. In order to further settlement talks, she told me that she had hinted to the Scientologists that she had information regarding a "conspiracy" which the Scientologists were convinced existed. She told me that she knew of no such "conspiracy," but had made these comments in order to keep them interested in settling her case. She made it clear to me that she was telling them what she thought they wanted to hear.

5. Paulette now told me that the Scientologists would only settle if she gave them a deposition detailing information she had about Michael Flynn's "conspiracy" against Scientology. When I asked her "what information," she replied something to the effect, "I don't know. I'll make it up as I go along." Scientology indicated to her that they would pay her extra for testimony against Michael Flynn. Paulette told me that "the trick is to get as much money as possible" while the group is in a paying mood.

6. Originally, Paulette told me that she was going to negotiate for as much money as possible in the settlement and in extra payments. Having the money safely in hand, in the Scientology deposition she would tell the truth about what she knew of the "conspiracy:" namely, that there is no "conspiracy." She was nervous, however, that her prior oblique references to the "conspiracy" were proving too vague to the Scientology negotiator. She felt that to close the deal and get more money, she

needed to come up with more credible information about this imaginary "conspiracy."

7. On Saturday, February 9, 1985, Paulette began to create events and scenarios which she would tell the Scientologists were part of the "conspiracy." She bounced them off me to see if they were plausible. For example, she said that she could tell them Michael Flynn showed us sealed documents relating to Gerald Armstrong's case after the court ordered all such documents to be sealed and returned to the court. I agreed that this is the kind of thing they might nibble on. Paulette and I knew that this never happened. I have never seen the Armstrong documents. This story was made up solely for the possible consumption of the Scientologists.

8. Paulette created similar stories such as Michael Flynn had knowingly filed frivolous lawsuits and had suborned perjury. These were stories; Paulette knew that none of these incidents had ever happened. She was going to imply that they had in order to enhance her negotiating status and obtain more money.

9. I left New York on Saturday afternoon. Paulette kept me informed throughout the week. The structure of the final deal was that Paulette would be paid a "settlement" of \$400,000. Unknownst to her attorneys, she would be required to give a sworn deposition about the Flynn "conspiracy" for which she was to receive at least \$50,000. (She also told me that she could receive as much as \$10,000 for additional affidavits incriminating Flynn.) The settlement could not be consummated unless she

agreed to the deposition. I was horrified to learn that Paulette no longer intended to tell the truth about the "conspiracy"--that it did not exist--but would instead tell under oath the stories that she had fabricated when I was with her on the weekend of February 8. I asked her in a heated conversation if she did not consider this a betrayal of her attorney, Michael Flynn, and others. She rationalized by stating that if a court found out that she had been paid \$50,000 for a deposition, it would not believe her anyway.

10. I know through Paulette that the initial phase of the settlement was completed and that she received the \$400,000. She told me that her deposition was scheduled to Saturday, February 23, 1985. I do not know how much she was paid for it or if it went forward.

11. Shortly before Paulette received her settlement, she called me somewhat excitedly and told me that she could get me out of the Garrison suit (a lawsuit brought against Paulette, myself, and others in which two individual Scientologists claimed we had involuntarily deprogrammed them.) I am a defendant in that case and I do not have a counterclaim in that case or any other lawsuit against any Church of Scientology. Yet Paulette informed me that the Scientologists would pay me \$10,000 and dismiss the suit if I apologised in writing to the Garrisons and gave a deposition confirming that Michael Flynn had violated the court order and showed us sealed documents. I was shocked. I told Paulette

that I could not give such a deposition because we never saw any documents. I told her that it was wrong to take money for false testimony and that she was getting in over her head.

12. Later that I called Michael Flynn and told him what Paulette was doing. Paulette learned of the phone conversation and called me on Monday, February 25. She was livid and told me that I may have cost her \$400,000. She also called me early the next morning. She told me that I had possibly "ruined everything," reiterated that I may have cost her \$400,000, and ordered me not to tell Michael Flynn anything more about our conversations. I have not spoken with her since then.

Signed and sworn this 9th day of March, 1985 in Boston, Massachusetts under the pains and penalties of perjury under the laws of the State of California.

Joseph M. Flanagan

JOSEPH M. FLANAGAN